IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

MWK	REC:	RUIT	ING	IN	C a	nd
COUN	SEL :	HOL	DING	S,	IN	C.

Civil Action No. 1:18-cv-00444

Plaintiffs,

V.

EVAN P. JOWERS,

Defendant.

DECLARATION OF JAMES C. BOOKHOUT IN SUPPORT OF DEFENDANT YULIYA VINOKUROVA'S APPLICATION FOR ATTORNEY'S FEES AND EXPENSES

DECLARATION OF JAMES C. BOOKHOUT

- I, James C. Bookhout, hereby declare as follows:
- 1. I am a partner with DLA Piper in Dallas, Texas, which was previously counsel of record for Defendants in the captioned action, including Yuliya Vinokurova, until DLA Piper withdrew from this case in June 2020. The facts set forth in this declaration are true of my own knowledge, and if called upon to testify, I could and would testify as thereto.
- 2. This declaration is made in support of Defendant Yuliya Vinokurova's Application for Attorney's Fees and Expenses.
- 3. Attached hereto as **Exhibit A** is a true and correct copy of certain billing invoices that DLA Piper generated while it represented Defendants, including Yuliya Vinokurova.
- 4. The hourly rates for each attorney that performed work reflected in each of the invoices were the reasonable market rates for firms similar to DLA Piper at the time the work was performed, and also took into account the experience of each attorney that performed work.

I declare under penalty of perjury under the laws of the State of Texas and the United States of America that the foregoing is true and correct. Executed this 7th day of August 2023 in Dallas, Texas.

10	/ James		$R_{\Omega\Omega}$	bhout
101	Jumes	U.	DUU	$\kappa noun$

James C. Bookhout

EXHIBIT A



1717 Main Street
Dallas,TX 75201-4605
T 214-743-4500
F 214-743-4545
www.dlapiper.com

PRIVILEGED AND CONFIDENTIAL

Revised June 13, 2018

May 16, 2018

DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong

M. Katz Matter # 422483-000001 Invoice # 3606550

For Professional Services Through April 30, 2018

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Matter: Employment law advice; File No.:

00394055-000001

Fees	\$ 10,575.00
Less Discount	\$ (2,115.00)
Current Fees	\$ 8,460.00
Current Disbursements	\$ 0.00
Total This Invoice	\$ 8,460.00

Please send remittance to: DLA Piper LLP (US)

P.O. Box 75190 Baltimore, MD 21275

Or wire remittance to: Wells Fargo Bank, N.A.

1300 I Street, NW, 11th Floor West Tower

Washington, DC 20005

Account Name: DLA Piper LLP (US)

Account No.: Redac ed ABA Transit No.: Redac ed Swift Code: Redac ed

Law Firm Tax Identification Number:

Redac ed

To ensure proper credit, please indicate the invoice number you are paying on the wire

M. Katz
Matter # 422483-000001
Page 2
Invoice # 3606550
May 16, 2018

Fees:

<u>Date</u>	<u>Description</u>	Timekeeper	Hours
04/10/18	Analyze petition for potential responses and defenses under Texas law and potential removal to federal court.	Bookhout, James C.	0.90
04/10/18	Review and analysis of lawsuit filed by MWK; analysis of jurisdictional and venue issues and preparation of outline of case strategy issues.	Katz, Marc Daniel	1.00
04/11/18	Analyze petition and Texas law and determine likely defenses to lawsuit; compose memorandum regarding proposed strategy for client review.	Bookhout, James C.	1.70
04/11/18	Review and analysis of lawsuit and documents attached thereto; analysis of venue and jurisdictional matters and preparation of strategy summary regarding same.	Katz, Marc Daniel	1.00
04/12/18	Preparation of outline of case issues in connection with preparation for meeting with Evan and analysis of strategy matters.	Katz, Marc Daniel	1.00
04/17/18	Update docket search regarding status of service of process; preparation of outline for meeting with Evan regarding strategy matters.	Katz, Marc Daniel	1.00
04/19/18	Compose brief outline of salient issues for meeting with E. Jowers and prepare for same.	Bookhout, James C.	0.70
04/20/18	Conference with E. Jowers concerning suit with MWK Recruiting, Inc./Robert Kinney, including background facts, strategy, and overview of relevant law.	Bookhout, James C.	1.40
04/23/18	Compose analysis of options regarding pending lawsuit filed by Robert Kinney, including risks and benefits of each option.	Bookhout, James C.	0.90
04/24/18	Attention to strategy issues and preparation of outline regarding same.	Katz, Marc Daniel	0.30
04/27/18	Review analysis from E. Jowers concerning possible lawsuit in Hong Kong and next steps in litigation.	Bookhout, James C.	0.20
04/27/18	Attention to issues regarding service of process in Texas proceeding; preparation of outline of strategy issues with respect to special appearance and motion to dismiss in Texas proceeding and potential declaratory judgment actions in Florida and Hong Kong.	Katz, Marc Daniel	1.00
04/30/18	Analyze strategy following service of process on E. Jowers; compose brief memorandum regarding recommended next steps in Texas litigation and basic strategic considerations for same.	Bookhout, James C.	0.70
04/30/18	Attention to defense strategy issues and preparation of outline of case strategy plan.	Katz, Marc Daniel	0.40

	M. Katz
Matter # 422483-000001	Page 3
Invoice # 3606550	May 16, 2018

Total Fees \$10,575.00

Less Discount \$(2,115.00)

Total Current Fees \$8,460.00

Time Summary

The following legal services were provided by DLA Piper LLP (US):

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Katz, Marc Daniel	Partner	5.70	1000.00	5,700.00
Bookhout, James C.	Associate	6.50	750.00	4,875.00
	Totals	12.20		10,575.00

Total Current Charges <u>\$8,460.00</u>

M. Katz

Matter # 422483-000001 Invoice # 3606550

May 16, 2018

REMITTANCE ADVICE

Fees	\$	10,575.00
Less Discount	<u>\$</u>	(2,115.00)
Current Fees	\$	8,460.00
Current Disbursements	<u>\$</u>	0.00
Total This Invoice	<u>\$</u>	8,460.00

PAYMENT DUE NO LATER THAN June 15, 2018 PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

Please send remittance to: DLA Piper LLP (US)

P.O. Box 75190 Baltimore, MD 21275

Or wire remittance to: Wells Fargo Bank, N.A.

1300 I Street, NW, 11th Floor West Tower

Washington, DC 20005

Account Name: DLA Piper LLP (US)

Account No.: Redac ed ABA Transit No.: Redac ed Swift Code: Redac ed

Law Firm Tax Identification Number: Redac ed

To ensure proper credit, please indicate the invoice number you are paying on the wire



Case 1:18-cv-00444-RP Document 406-1 Filed ը Զ/ը Ք/ը (Ք թգ 9 of 98

1717 Main Street Dallas, TX 75201-4605

T 214-743-4500 F 214-743-4545 www.dlapiper.com

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DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China

June 27, 2018

M Katz Matter # 422483-000001 Invoice # 3623791

For Professional Services Through May 31, 2018

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Employment law advice; File No.: *Matter:*

00394055-000001

Fees	USD	35,542.00
Less 20% Discount	USD	(7,108.40)
Current Fees	USD	28,433.60
Current Disbursements	USD	400.00
Total This Invoice	USD	28,833.60

Please send remittance to: DLA Piper LLP (US)

P.O. Box 75190 Baltimore, MD 21275

Or wire remittance to: Wells Fargo Bank, N.A.

1300 I Street, NW, 11th Floor West Tower Washington, DC 20005

Account Name: DLA Piper LLP (US) Account No.: Redacted ABA Transit No.: Redacted Swift Code: Redacted

Law Firm Tax Identification Number: Redacted To ensure proper credit, please indicate the invoice number you are paying on the wire

M Katz
Matter # 422483-000001
Page 2
Invoice # 3623791
June 27, 2018

Fees:

<u>Date</u>	Description	<u>Timekeeper</u>	Hours	Amount
05/02/18	Analyze potential removal to federal court and deadline for same.	Bookhout, James C.	0.20	150.00
05/02/18	Review docket for returns of service, correspondence regarding same; calculate and docket deadline for removal.	Eason-Hall, Erica	0.30	102.00
05/02/18	Analyze strategy regarding whether to file a Rule 12 Motion to Dismiss or a Motion to Transfer to enforce a forum selection clause.	_	0.10	48.50
05/03/18	Analyze strategy regarding Federal Rule of Civil Procedure 81 and repleading a special appearance.	O'Connor, Breegan	0.10	48.50
05/04/18	Preparation of outline of strategic issues regarding answer, special appearance, removal, motion to disqualify, and counterclaims.	Katz, Marc Daniel	0.60	600.00
05/06/18	Analyze strategy regarding potential counterclaims against Robert Kinney in Texas litigation.	Bookhout, James C.	0.20	150.00
05/07/18	Analyze emails from Robert Kinney to clients of E. Jowers; compose outline of revised litigation strategy for review by E. Jowers.	Bookhout, James C.	1.30	975.00
05/07/18	Preparation of responsive pleadings.	Katz, Marc Daniel	0.30	300.00
05/07/18	Analyze Federal law, specifically within the Fifth Circuit, to determine whether a party should file a Rule 12 Motion to Dismiss or a Motion to Transfer to enforce a forum selection clause; analyze Federal law, specifically Fed. R. Civ. Pro. 81(c)(2), regarding whether a party must replead a special appearance in Federal Court if it previously filed a special appearance in State Court.	O'Connor, Breegan	2.60	1,261.00
05/08/18	Revise and finalize outline of litigation strategy for review and approval by E. Jowers; confer with M. Katz regarding same.	Bookhout, James C.	0.60	450.00
05/09/18	Analyze comments from E. Jowers to litigation strategy and next steps regarding same.	Bookhout, James C.	0.30	225.00
05/09/18	Attention to case strategy issues and preparation of litigation plan.	Katz, Marc Daniel	0.30	300.00
05/14/18	Compose special appearance and motion to	Bookhout, James C.	3.40	2,550.00

M Katz Page 3 June 27, 2018

<u>Date</u>	Description dismiss due to forum selection clause on behalf of Evan Jowers and Jowers/Vargas; analyze and incorporate Texas law in support of jurisdictional arguments.	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
05/15/18	Continue to compose special appearance and motion to dismiss; compose Declaration of Evan P. Jowers in support of same.	Bookhout, James C.	2.90	2,175.00
05/16/18	Analyze potential service of process defenses for Legis Ventures; compose and revise draft Special Appearance and Motion to Dismiss pursuant to forum selection clause; compose and revise draft Declaration of Evan P. Jowers; correspond with E. Jowers in several emails concerning questions regarding service and case strategy.	Bookhout, James C.	3.10	2,325.00
05/17/18	Conference with E. Jowers and A. Vargas concerning procedural defenses and litigation strategy; compose and revise responsive pleadings and Declaration of Evan P. Jowers to incorporate factual information received from E. Jowers during conference; correspond with E. Jowers concerning draft responsive pleadings and recommendations for review and comment.	Bookhout, James C.	2.60	1,950.00
05/17/18	Obtain current court docket sheet and returns of service of citation; calculate response deadlines based on additional service information; correspondence regarding same; coordinate with runner service to obtain official copies of court file to include with Notice of Removal.	Eason-Hall, Erica	2.00	680.00
05/18/18	Attention to issues regarding preparation of answer and removal papers.	Katz, Marc Daniel	2.00	2,000.00
05/19/18	Compose and revise Special Appearance and Declaration of Evan P. Jowers to incorporate comments from E. Jowers; review and revise pleadings for clarity, consistency, and strength of argument; correspond with E. Jowers in several emails concerning pleadings and with instructions for final review and execution of same.	Bookhout, James C.	2.80	2,100.00
05/20/18	Revise Special Appearance and Declaration of Evan P. Jowers to incorporate additional comments from E. Jowers; correspond with E. Jowers in approximately 12 emails concerning responsive pleadings and	Bookhout, James C.	1.90	1,425.00

M Katz Page 4 June 27, 2018

<u>Date</u>	Description	<u>Timekeeper</u>	Hours	Amount
	strategy regarding same.			
05/20/18	Attention to case strategy issues and preparation of responsive pleadings.	Katz, Marc Daniel	1.30	1,300.00
05/21/18	Finalize and ensure delivery of Special Appearance and supporting Declaration of Evan P. Jowers to Court by required deadline; compose notice of removal to federal court; analyze possible objections to federal subject matter jurisdiction and review federal law regarding same to establish good faith basis for federal jurisdiction.	Bookhout, James C.	1.30	975.00
05/21/18	Review, finalize and electronically file Defendants' Special Appearance and Motion to Dismiss; correspondence regarding same.	Eason-Hall, Erica	0.50	170.00
05/21/18	Attention to matters regarding finalizing special appearance and analysis of strategy issues.	Katz, Marc Daniel	0.20	200.00
05/22/18	Continue to compose notice of removal to federal court; analyze federal law in support of allegations in notice of removal and incorporate into Notice of Removal; compose Declaration of Evan P. Jowers in support of same.	Bookhout, James C.	4.20	3,150.00
05/22/18	Preparation of removal documents.	Katz, Marc Daniel	0.40	400.00
05/23/18	Continue to compose Notice of Removal; compose Declaration of Yuliya Vinokurova; continue to compose Declaration of Evan P. Jowers; correspond with E. Jowers concerning drafts of pleadings and required additional information.	Bookhout, James C.	1.80	1,350.00
05/23/18	Receive instruction regarding Notice of Removal Corporate Disclosure Statements and next steps.	Eason-Hall, Erica	0.20	68.00
05/24/18	Revise Notice of Removal for clarity and strength of argument; correspond with Y. Vinokurova in several emails regarding Declaration of Yuliya Vinokurova and revise same to incorporate Y. Vinokurova's comments; review comments to draft Declaration of Evan P. Jowers from E. Jowers and incorporate same; correspond with E. Jowers in several emails concerning Declaration of Evan P. Jowers and advice concerning contents of same; revise Notice of Removal to incorporate changes to	Bookhout, James C.	2.60	1,950.00

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Matter # 422483-000001
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Invoice # 3623791
June 27, 2018

<u>Date</u>	Description	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
	declarations based on comments from E. Jowers and Y. Vinokurova.			
05/24/18	Review Notice of Removal pleadings in preparation of filing same with Court; review pleadings obtain from state court matter.	Eason-Hall, Erica	0.80	272.00
05/24/18	Attention to matters regarding preparation of removal documents and attention to case strategy issues.	Katz, Marc Daniel	0.40	400.00
05/25/18	Finalize Notice of Removal to federal court; finalize Declaration of Evan P. Jowers; finalize Declaration of Yuliya Vinokurova; compose Notice of Filing of Notice of Removal for state court as required by 28 U.S.C. § 1446; correspond separately with E. Jowers and Y. Vinokurova in several emails regarding pleadings and case status.	Bookhout, James C.	3.40	2,550.00
05/25/18	Receive instruction regarding Notice of Removal; draft Certificate of Interested Persons for Legis Ventures, Civil Case Information Sheet, Supplemental Case Information Sheet, and Index of State Court Documents; prepare exhibits to notice of removal and all state court documents to attach to index; correspondence regarding same; open federal case; electronically file notice of removal and coordinate service of paper copies on counsel; draft letter to counsel regarding same; finalize and electronically file Notice of Filing of Notice of Removal in state court action and serve same on counsel.	Eason-Hall, Erica	6.30	2,142.00
05/25/18	Attention to case strategy issues.	Katz, Marc Daniel	0.20	200.00
05/30/18	Compose unopposed motion for extension of time to file response to First Amended Petition; compose proposed order granting same as required by local rules; finalize and deliver same to court and ensure service on opposing counsel as required by law.	Bookhout, James C.	0.80	600.00
	Total H	ours		52.00
	Total F	ees	US	D 35,542.00

Less 20% Discount

USD (7,108.40)

M Katz
Matter # 422483-000001
Page 6
Invoice # 3623791
June 27, 2018

Total Current Fees USD 28,433.60

Time Summary

The following legal services were provided by DLA Piper LLP (US):

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Katz, Marc Daniel	Partner	5.70	1000.00	5,700.00
Bookhout, James C.	Associate	33.40	750.00	25,050.00
O'Connor, Breegan	Associate	2.80	485.00	1,358.00
Eason-Hall, Erica	Paralegal	10.10	340.00	3,434.00
	Totals	52.00		35,542.00

Disbursements:

Date	<u>Description</u>	Amount
05/30/18	FILING/RECORDING FEES - VENDOR: JAMES BOOKHOUT - 05/12/18 - FEDERAL COURT FILING - FILING FEE FOR FEDERAL LAWSUIT Bank ID: FNB-0 Check Number: 1339441	400.00

Total Disbursements <u>USD 400.00</u>

Total Current Charges <u>USD 28,833.60</u>

DLA Piper Hong Kong M Katz

17th Floor, Edinburgh Tower

The Landmark June 27, 2018

15 Queen's Road, Central Hong Kong

China

Matter # 422483-000001 Invoice # 3623791

REMITTANCE ADVICE

Fees	USD	35,542.00
Less 20% Discount	USD	(7,108.40)
Current Fees	USD	28,433.60
Current Disbursements	USD	400.00
Total This Invoice	USD	28,833.60

PAYMENT DUE NO LATER THAN July 27, 2018 PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

Please send remittance to: DLA Piper LLP (US)

P.O. Box 75190 Baltimore, MD 21275

Wells Fargo Bank, N.A. Or wire remittance to:

1300 I Street, NW, 11th Floor West Tower Washington, DC 20005

Account Name: DLA Piper LLP (US) Account No.: Redacted ABA Transit No.: Redacted Swift Code: Redacted

Law Firm Tax Identification Number: Redacted To ensure proper credit, please indicate the invoice number you are paying on the wire

Case 1:18-cv-00444-RP Document 406-1 Filed ՈԶ/08/23 թ թցցе 16 of 98

1717 Main Street Dallas, TX 75201-4605

T 214-743-4500 F 214-743-4545 www.dlapiper.com

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DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China

July 18, 2018

M Katz Matter # 422483-000001 Invoice # 3633969

For Professional Services Through June 30, 2018

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Employment law advice; File No.: *Matter:*

00394055-000001

Fees	USD	30,822.00
Less 20% Discount	USD	(6,164.40)
Current Fees	USD	24,657.60
Current Disbursements	USD	568.13
Total This Invoice	USD	25,225.73
Prior Outstanding Balance	USD	28,833.60
Total Account Balance	USD	54,059.33

DLA Piper LLP (US) Please send remittance to:

P.O. Box 75190 Baltimore, MD 21275

Or wire remittance to: Wells Fargo Bank, N.A.

1300 I Street, NW, 11th Floor West Tower Washington, DC 20005

Account Name: DLA Piper LLP (US) Account No.: Redacted ABA Transit No.: Redacted Swift Code: Redacted

Law Firm Tax Identification Number: Redacted To ensure proper credit, please indicate the invoice number you are paying on the wire

M Katz
Matter # 422483-000001
Page 2
Invoice # 3633969
July 18, 2018

Fees:

<u>Date</u>	Description	<u>Timekeeper</u>	Hours	Amount
06/01/18	Correspond with Robert Kinney regarding representation and response to request for recommendation.	Bookhout, James C.	0.20	150.00
06/01/18	Obtain and review Request for Issuance of Summons for Yuliya Vinokurova; review order setting deadline for Defendants Jowers and Legis Ventures to answer complaint and docket same.	Eason-Hall, Erica	0.20	68.00
06/01/18	Attention to issues regarding overall case strategy and matters related thereto.	Katz, Marc Daniel	0.40	400.00
06/03/18	Compose outline of arguments for motion to dismiss and analyze legal defenses to First Amended Petition suitable for Rule 12(b) motion.	Bookhout, James C.	1.20	900.00
06/04/18	Compose motion to dismiss case for lack of standing and for lack of personal jurisdiction; analyze federal law in support of arguments and include in brief as appropriate; review and revise draft Supplement to Index of State Court Documents required by order from Judge Pitman; correspond with E. Jowers and Y. Vinokurova in several emails concerning case strategy and in response to questions posed by E. Jowers.	Bookhout, James C.	5.80	4,350.00
06/04/18	Touch base regarding case status and next steps; obtain state court docket sheet and draft supplement to index of documents for notice of removal; correspondence regarding same; electronically file Supplement to Index of State Court Documents with court; obtain file-marked copy of Unopposed Motion for Extension of Time to File Answer, Request for Issuance of Summons, Summons for Juliya Vinokurova and Motion for Admission Pro Hac Vice of Robert Kinney; draft letter to Robert Kinney serving supplement to notice of removal; update electronic file.	Eason-Hall, Erica	1.20	408.00
06/05/18	Continue to compose motion to dismiss, including sections regarding lack of personal jurisdiction (Rule 12(b)(2)), improper service of process on Legis Ventures (Rule 12(b)(5)), and failure to state a claim upon which relief can be granted	Bookhout, James C.	6.30	4,725.00

M Katz Page 3 July 18, 2018

<u>Date</u>	Description (Rule 12(b)(6)); conference with E. Jowers concerning case strategy regarding venue and potential transfer to Florida; correspond with opposing counsel regarding page limits and their proposal for entering briefing schedule and correspond with E. Jowers concerning same.	<u>Timekeeper</u>	<u>Hours</u>	Amount
06/05/18	Attention to matters regarding motion to dismiss and issues related thereto.	Katz, Marc Daniel	1.00	1,000.00
06/06/18	Continue to compose Motion to Dismiss, including sections related to failure to state a claim for breach of contract, fraud, misappropriation of trade secrets, and tortious interference with existing and prospective contracts; compose declaration of Evan P. Jowers in support of Motion to Dismiss sections concerning lack of standing, lack of personal jurisdiction, and insufficient service of process; correspond with opposing counsel in multiple emails concerning agreement on briefing schedule to obtain amended complaint prior to finalizing motion to dismiss; compose agreed motion and order to enter amended briefing schedule; correspond with E. Jowers in several emails concerning declaration and review of same and Robert Kinney's failure to comply with agreement on briefing schedule.	Bookhout, James C.	7.80	5,850.00
06/06/18	Review correspondence with opposing counsel regarding his agreement to accept service of pleadings via email; update electronic file to include agreement; confer regarding answer and next steps; receive instruction and electronically file Motion to Increase Page Limit for Dispositive Motion with Court; obtain file-marked copies and update electronic file; serve same on opposing counsel.	Eason-Hall, Erica	0.80	272.00
06/07/18	Correspond with E. Jowers in several emails regarding comments to Declaration; revise declaration to incorporate comments from E. Jowers; review request for waiver of service from opposing counsel and draft Motion for Substitute Service and provide advice to Y. Vinokurova regarding same; continue to compose Motion to Dismiss sections regarding failure to state a claim,	Bookhout, James C.	5.70	4,275.00

M Katz Page 4 July 18, 2018

<u>Date</u>	Description including uneforceability of restrictive covenants; revise Motion to Dismiss for clarity and strength of argument; analyze federal law and identify helpful cases in support of arguments and incorporate into Motion to Dismiss; correspond with E. Jowers concerning Motion to Dismiss and review of same.	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
06/07/18	Attention to preparation of motion to dismiss and declaration in support; correspondence with MWK counsel regarding case matters.	Katz, Marc Daniel	0.70	700.00
06/07/18	Analyze Federal law, preferably within the Fifth Circuit, regarding whether telephone or e-mail communication within a forum state constitutes sufficient minimum contacts for personal jurisdiction.	O'Connor, Breegan	0.80	388.00
06/08/18	Review and revise Motion to Dismiss all claims in lawsuit to strengthen arguments and particularly preliminary statement and to include additional Florida case law; analyze and review brief to ensure compliance with local rules and required format; correspond with E. Jowers in multiple emails concerning comments to declaration; revise Declaration of Evan P. Jowers to incorporate client comments to same; obtain and prepare final declaration; ensure delivery of Motion to Dismiss and declaration in support to client and provide copy of final file-stamped document to client.	Bookhout, James C.	4.70	3,525.00
06/08/18	Confer regarding motion to dismiss to be filed with court and next steps in litigation; finalize and electronically file Motion to Dismiss with Court; obtain file-marked copy of same and serve on counsel via email.	Eason-Hall, Erica	0.80	272.00
06/08/18	Attention to matters regarding service on Yuliya and attention to strategy regarding venue/forum.	Katz, Marc Daniel	0.40	400.00
06/11/18	Review and revise draft stipulation regarding waiver of service for Y. Vinokurova; compose waiver of service of process for Y. Vinokurova; correspond with opposing counsel concerning same.	Bookhout, James C.	0.60	450.00
06/11/18	Attention to electronic file updates with recent pleadings filed in federal court;	Eason-Hall, Erica	1.50	510.00

M Katz Page 5 July 18, 2018

<u>Date</u>	<u>Description</u> review Judge Pittman's procedures for	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
	courtesy copies; confer regarding next steps; receive instruction regarding stipulation regarding acceptance of service; draft Stipulation regarding Waiver of Service for Yuliya Vinokurova.			
06/12/18	Review correspondence from opposing counsel regarding tax return invoice and correspond with client regarding same.	Bookhout, James C.	0.30	225.00
06/12/18	Attention to matters regarding next steps in litigation and issues regarding same.	Katz, Marc Daniel	0.70	700.00
06/13/18	Correspond with opposing counsel regarding tax accountant statement and correspond with client concerning same.	Bookhout, James C.	0.20	150.00
06/21/18	Calculate and docket deadlines for Plaintiff to respond to Motion to Dismiss and Motion for Remand.	Eason-Hall, Erica	0.20	68.00
06/21/18	Attention to case status and strategy matters.	Katz, Marc Daniel	0.20	200.00
06/22/18	Review correspondence with opposing counsel regarding extension of time for Plaintiff to respond to Motion to Dismiss; obtain and review Motion for Extension and update electronic file.	Eason-Hall, Erica	0.30	102.00
06/25/18	Review order granting extension of time for Plaintiff to respond to motion to dismiss and update docket and electronic file accordingly.	Eason-Hall, Erica	0.10	34.00
06/29/18	Attention to matters regarding Kinney's amended answer and finalized and filed motion to dismiss.	Katz, Marc Daniel	0.70	700.00
	Total H	ours		42.80
	Total Fees		USD 30,822.00	
	Less 20% Discount		USD (6,164.40)	
	Total (Current Fees	US	SD 24,657.60

	M Katz
Matter # 422483-000001	Page 6
Invoice # 3633969	July 18, 2018

Time Summary

The following legal services were provided by DLA Piper LLP (US):

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Katz, Marc Daniel	Partner	4.10	1000.00	4,100.00
Bookhout, James C.	Associate	32.80	750.00	24,600.00
O'Connor, Breegan	Associate	0.80	485.00	388.00
Eason-Hall, Erica	Paralegal	5.10	340.00	1,734.00
	Totals	42.80		30,822.00

Disbursements:

Date	Description	Amount
06/30/18	DELIVERY SERVICES - VENDOR: SPECIAL DELIVERY SERVICE, INC 05/30/2018 CONNIE DUKE DELIVERED TO: MAIN POST OFFICE Bank ID: FNB-0 Check Number: 1344129	52.00
06/30/18	DELIVERY SERVICES - VENDOR: SPECIAL DELIVERY SERVICE, INC 05/30/2018 CONNIE DUKE DELIVERED TO: DLA PIPER US LLP Bank ID: FNB-0 Check Number: 1344129	39.31
06/30/18	ON-LINE RESEARCHING - VENDOR: WEST GROUP PAYMENT CENTER * WCX WEST - USAGE 5/01/2018 - 5/31/2018 Bank ID: FNB-0 Check Number: 1344982	476.82

Total Disbursements <u>USD 568.13</u>

Total Current Charges <u>USD 25,225.73</u>

DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong

M Katz

July 18, 2018

Matter # 422483-000001 Invoice # 3633969

China

REMITTANCE ADVICE

Fees	USD	30,822.00
Less 20% Discount	USD	(6,164.40)
Current Fees	USD	24,657.60
Current Disbursements	USD	568.13
Total This Invoice	USD	25,225.73

Outstanding Invoice Summary

Date	Invoice	Amount Payments/	<u>Adjustments</u>	Balance
06/27/18	3623791	USD 28,833.60	USD 0.00	USD 28,833.60
		Prior Outstanding Balance	USD	28,833.60
		Total Account Balance	USD	54,059.33

PAYMENT DUE NO LATER THAN August 17, 2018 PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

Please send remittance to: DLA Piper LLP (US)

P.O. Box 75190 Baltimore, MD 21275

Or wire remittance to: Wells Fargo Bank, N.A.

1300 I Street, NW, 11th Floor West Tower Washington, DC 20005

Account Name: DLA Piper LLP (US) Account No.: Redacted ABA Transit No.: Redacted Swift Code: Redacted

Law Firm Tax Identification Number: Redacted To ensure proper credit, please indicate the invoice number you are paying on the wire



Case 1:18-cv-00444-RP Document 406-1 Filed ի Զ/ 0-Զ/ 23 թ թյցе 23 of 98

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DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China

August 28, 2018

M Katz Matter # 422483-000001 Invoice # 3650346

For Professional Services Through July 31, 2018

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Employment law advice; File No.: *Matter:*

00394055-000001

Fees 61,461.00 Less 20% Discount (12,292.20)Current Fees 49,168.80 **Current Disbursements** 0.00 Total This Invoice USD 49,168.80

Please send remittance to: DLA Piper LLP (US)

P.O. Box 75190 Baltimore, MD 21275

Or wire remittance to: Wells Fargo Bank, N.A.

1300 I Street, NW, 11th Floor West Tower Washington, DC 20005

Account Name: DLA Piper LLP (US) Account No.: Redacted ABA Transit No.: Redacted Swift Code: Redacted

Law Firm Tax Identification Number: Redacted To ensure proper credit, please indicate the invoice number you are paying on the wire

M Katz
Matter # 422483-000001
Page 2
Invoice # 3650346
August 28, 2018

Fees:

<u>Date</u>	Description	<u>Timekeeper</u>	<u>Hours</u>	Amount
07/02/18	Analyze Amended Complaint and Response to Motion to Dismiss; correspond with clients concerning same; analyze strategy in response to Amended Complaint and potential for motion to strike.	Bookhout, James C.	1.20	900.00
07/02/18	Touch base regarding case status and next steps; obtain and review First Amended Complaint and Response to Motion to Dismiss filed by Plaintiff and update electronic file; calculate and docket deadline to file Reply in support of Motion to Dismiss; correspondence regarding same.	Eason-Hall, Erica	0.40	136.00
07/02/18	Review and analysis of Kinney's amended complaint and response to motion to dismiss; preparation of outline of issues with respect to preparation of reply to Kinney's response to motion to dismiss.	Katz, Marc Daniel	1.00	1,000.00
07/03/18	Review case filings and conduct research in support of motion to strike plaintiff's amended complaint.	Stefanova, Marina	1.50	922.50
07/04/18	Compose motion for extension of time to file reply brief and proposed order regarding same in compliance with local rules.	Bookhout, James C.	0.60	450.00
07/05/18	Finalize motion for extension and obtain same for reply brief in support of motion to dismiss.	Bookhout, James C.	0.20	150.00
07/05/18	Finalize and electronically file Motion for Extension of Time to File Reply to Response to Motion to Dismiss and proposed Order with Court; obtain filemarked copies of same and serve on counsel via email; update electronic file.	Eason-Hall, Erica	0.50	170.00
07/05/18	Review case filings and conduct research in support of motion to strike plaintiff's amended complaint.	Stefanova, Marina	1.00	615.00
07/06/18	Review Order Granting Extension of Time to File Reply and update docket and electronic file.	Eason-Hall, Erica	0.10	34.00
07/06/18	Conduct research for and draft motion to strike amended complaint.	Stefanova, Marina	5.30	3,259.50
07/07/18	Conduct research for and draft motion to strike amended complaint.	Stefanova, Marina	2.40	1,476.00
07/08/18	Conduct research for and draft motion to	Stefanova, Marina	2.70	1,660.50

M Katz Page 3 August 28, 2018

<u>Date</u>	Description	Timekeeper	Hours	Amount
	strike amended complaint.			
07/09/18	Analyze Amended Complaint to determine basis for arguments in reply brief; review and revise draft Motion to Strike Amended Complaint; analyze strategic options regarding reply in support of original Motion to Dismiss and renewed Motion to Dismiss.	Bookhout, James C.	2.30	1,725.00
07/09/18	Conduct research for, draft, and revise motion to strike amended complaint and proposed order.	Stefanova, Marina	6.90	4,243.50
07/10/18	Analyze amended complaint and compose reply brief in support of Motion to Dismiss; review and revise reply brief for clarity and strength of argument.	Bookhout, James C.	5.80	4,350.00
07/10/18	Receive instruction and file motion to extend deadline to respond to amended complaint and proposed order; serve same on counsel via email.	Eason-Hall, Erica	0.40	136.00
07/10/18	Prepare motion for extension of time to respond to Amended Complaint and proposed order.	Stefanova, Marina	1.00	615.00
07/11/18	Review request from opposing counsel regarding waivers of service as to A. Vargas and Legis Ventures and correspond with clients and opposing counsel concerning same; review orders received from court regarding motion to dismiss.	Bookhout, James C.	0.50	375.00
07/11/18	Obtain and review orders issued by court regarding briefing deadlines; update docket and electronic file.	Eason-Hall, Erica	0.30	102.00
07/11/18	Cite-check, review, and edit motion to strike and prepare accompanying exhibit.	Stefanova, Marina	1.70	1,045.50
07/16/18	Attention to case strategy issues.	Katz, Marc Daniel	0.40	400.00
07/19/18	Conduct research and review case filings in preparation for drafting renewed motion to dismiss plaintiff's first amended complaint.	Stefanova, Marina	1.70	1,045.50
07/20/18	Compose and prepare waiver of service for Y. Vinokurova; revise stipulation and order to obtain extension of time; analyze and review W2s provided by E. Jowers.	Bookhout, James C.	0.60	450.00
07/20/18	Conduct research for and prepare renewed motion to dismiss plaintiff's first amended complaint and revise accompanying declaration of E. Jowers.	Stefanova, Marina	2.80	1,722.00

M Katz
Matter # 422483-000001
Page 4
Invoice # 3650346
August 28, 2018

<u>Date</u>	<u>Description</u>	<u>Timekeeper</u>	<u>Hours</u>	Amount
07/21/18	Attention to conference with plaintiffs' counsel regarding various case matters.	Katz, Marc Daniel	0.40	400.00
07/22/18	Research whether A. Vargas and Legis Ventures can be held liable for costs of service for refusing to waive service of process.	Stefanova, Marina	1.30	799.50
07/22/18	Conduct research for and prepare renewed motion to dismiss plaintiff's first amended complaint and revise accompanying declaration of E. Jowers.	Stefanova, Marina	5.90	3,628.50
07/23/18	Analyze arguments for Renewed Motion to Dismiss; correspond with E. Jowers regarding W2s.	Bookhout, James C.	0.40	300.00
07/23/18	Conduct research for and prepare renewed motion to dismiss plaintiff's first amended complaint and revise accompanying declaration of E. Jowers.	Stefanova, Marina	2.10	1,291.50
07/24/18	Review and revise declaration of Evan P. Jowers in support of Renewed Motion to Dismiss; correspond with E. Jowers regarding declaration; analyze necessity for additional statements in declaration to support standing arguments.	Bookhout, James C.	2.10	1,575.00
07/24/18	Conduct research for and prepare renewed motion to dismiss plaintiff's first amended complaint and revise accompanying declaration of E. Jowers.	Stefanova, Marina	6.00	3,690.00
07/24/18	Research whether Legis Ventures can be held liable for costs of service for refusing to waive service of process based on Jowers's potential presence in the U.S.	Stefanova, Marina	1.50	922.50
07/25/18	Compose and revise Renewed Motion to Dismiss to improve arguments and identify additional required areas of case law in Fifth Circuit; compose and revise additional paragraph in Declaration of Evan P. Jowers to incorporate response to allegations regarding assignment and standing; review and revise Motion to Increase Page Limit for Renewed Motion to Dismiss and associated proposed order.	Bookhout, James C.	2.60	1,950.00
07/25/18	Coordinate regarding brief; to be filed; finalize and electronically file Unopposed Motion for Increased Page Limit for Renewed Motion to Dismiss and proposed Order with Court; coordinate service of	Eason-Hall, Erica	0.50	170.00

M Katz Page 5 August 28, 2018

<u>Date</u>	<u>Description</u> same on counsel; obtain file-marked copies of same and update electronic file.	<u>Timekeeper</u>	<u>Hours</u>	Amount
07/25/18	Prepare motion to dismiss and brief in support.	Katz, Marc Daniel	1.30	1,300.00
07/25/18	Prepare motion for extension of the page limit for renewed motion to dismiss plaintiff's first amended complaint and accompanying proposed order.	Stefanova, Marina	0.60	369.00
07/25/18	Conduct research for and prepare renewed motion to dismiss plaintiff's first amended complaint and revise accompanying declaration of E. Jowers.	Stefanova, Marina	3.30	2,029.50
07/26/18	Compose and revise Renewed Motion to Dismiss; correspond with E. Jowers in multiple emails concerning assertions in draft declaration; analyze and compose changes to Declaration of Evan P. Jowers to comport with same.	Bookhout, James C.	2.80	2,100.00
07/26/18	Review order granting extension of page limit.	Eason-Hall, Erica	0.10	34.00
07/26/18	Attention to matters regarding motion to dismiss and Jowers' declaration in support thereof; attention to issues regarding preparation of motion to strike.	Katz, Marc Daniel	1.00	1,000.00
07/26/18	Conduct follow-up research for and revise renewed motion to dismiss and Jowers's declaration in support.	Stefanova, Marina	7.50	4,612.50
07/27/18	Compose and revise Renewed Motion to Dismiss for clarity and strength of argument; compose and revise Motion to Strike Amended Pleading; review and revise proposed order on Motion to Strike; correspond with opposing counsel concerning required conference on Motion to Strike; correspond with E. Jowers in multiple emails concerning allegations in Declaration and obtain execution of same; finalize and ensure delivery of Renewed Motion to Dismiss and Motion to Strike to court.	Bookhout, James C.	4.90	3,675.00
07/27/18	Receive instruction and prepare and finalize Motion to Strike for and Motion to Dismiss for filing with Court; correspondence regarding same; finalize and electronically file same with Court and serve counsel; obtain file-marked copies and update	Eason-Hall, Erica	1.20	408.00

M Katz
Matter # 422483-000001
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Invoice # 3650346
August 28, 2018

<u>Date</u>	<u>Description</u>	<u>Timekeeper</u>	<u>Hours</u>	Amount
	electronic file.			
07/27/18	Finalized motion to strike and brief in support.	Katz, Marc Daniel	0.80	800.00
07/27/18	Coordinate redaction of attachments, revise declaration in support of motion to dismiss, and review, citecheck, and finalize for filing motion to dismiss.	Stefanova, Marina	4.70	2,890.50
07/27/18	Review, revise, and finalize for filing motion to strike first amended complaint.	Stefanova, Marina	0.70	430.50
07/30/18	Calculate and docket deadlines for Plaintiff to respond to Motion to Strike and Motion to Dismiss; update electronic file with text order granting Motion to Increase Page Limit.	Eason-Hall, Erica	0.30	102.00
Total Hours			93.30	
	Total Fees			61,461.00
	Less 20% Discount			(12,292.20)
	Total Current Fees			49,168.80

Time Summary

The following legal services were provided by DLA Piper LLP (US):

Timekeeper	<u>Title</u>	Hours	Rate	Amount
Katz, Marc Daniel	Partner	4.90	1000.00	4,900.00
Bookhout, James C.	Associate	24.00	750.00	18,000.00
Stefanova, Marina	Associate	60.60	615.00	37,269.00
Eason-Hall, Erica	Paralegal	3.80	340.00	1,292.00
	Totals	93.30		61,461.00

Total Current Charges

USD 49,168.80

DLA Piper Hong Kong M Katz 17th Floor, Edinburgh Tower

The Landmark

15 Queen's Road, Central

Hong Kong China

Matter # 422483-000001 Invoice # 3650346

REMITTANCE ADVICE

Fees 61,461.00 Less 20% Discount (12,292.20)**Current Fees** 49,168.80 **Current Disbursements** 0.00 **Total This Invoice USD** 49,168.80

PAYMENT DUE NO LATER THAN September 27, 2018 PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

Please send remittance to: DLA Piper LLP (US)

P.O. Box 75190 Baltimore, MD 21275

Or wire remittance to: Wells Fargo Bank, N.A.

1300 I Street, NW, 11th Floor West Tower Washington, DC 20005

Account Name: DLA Piper LLP (US) Account No.: Redacted ABA Transit No.: Redacted Swift Code: Redacted

Law Firm Tax Identification Number: Redacted To ensure proper credit, please indicate the invoice number you are paying on the wire

August 28, 2018



Case 1:18-cv-00444-RP Document 406-1 Filed ի Զ/ 0-Զ/ 23-ը թեցք 30 of 98

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DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China

September 21, 2018

M Katz Matter # 422483-000001 Invoice # 3660830

For Professional Services Through August 31, 2018

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Employment law advice; File No.: *Matter:*

00394055-000001

Fees 40,474.50 Less 20% Discount (8,094.90)Current Fees 32,379.60 **Current Disbursements** 0.00 Total This Invoice USD 32,379.60

Please send remittance to: DLA Piper LLP (US)

P.O. Box 75190 Baltimore, MD 21275

Or wire remittance to: Wells Fargo Bank, N.A.

1300 I Street, NW, 11th Floor West Tower Washington, DC 20005

Account Name: DLA Piper LLP (US) Account No.: Redacted ABA Transit No.: Redacted Swift Code: Redacted

Redacted Law Firm Tax Identification Number:

To ensure proper credit, please indicate the invoice number you are paying on the wire

M Katz
Matter # 422483-000001
Page 2
Invoice # 3660830
September 21, 2018

Fees:

<u>Date</u>	Description	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
08/02/18	Analyze correspondence from opposing counsel and compose extensive response to same; correspond with E. Jowers regarding status of litigation.	Bookhout, James C.	0.90	675.00
08/02/18	Attention to correspondence with Kinney and counsel for plaintiffs regarding motion to dismiss, motion to strike and Kinney's amended complaints.	Katz, Marc Daniel	1.20	1,200.00
08/03/18	Correspond with opposing counsel regarding outstanding disputes.	Bookhout, James C.	0.30	225.00
08/03/18	Obtain and review Order Granting Pro Hac Vice admission and update electronic file.	Eason-Hall, Erica	0.10	34.00
08/03/18	Research and assess viability of motion to disqualify Robert Kinney as counsel for MWK.	Stefanova, Marina	3.00	1,845.00
08/06/18	Conference with E. Jowers regarding response to opposing counsel's request to consent to filing of amended complaint; analyze strategy in response to same and composed proposed correspondence to opposing counsel for client review.	Bookhout, James C.	0.60	450.00
08/07/18	Conduct research for and assess viability of motion to disqualify Robert Kinney as counsel for MWK.	Stefanova, Marina	1.10	676.50
08/08/18	Review and analyze response to opposing counsel concerning outstanding litigation issues.	Bookhout, James C.	0.20	150.00
08/08/18	Analysis of issues regarding Kinney's deadline to response to Motion to Strike Amended Complaint and matters related thereto.	Katz, Marc Daniel	0.40	400.00
08/09/18	Research deadlines for responding to dispositive and nondispositive motions under Local Rules in preparation for responding to Plaintiff's request for extension of time to respond to motion to strike.	Stefanova, Marina	0.20	123.00
08/09/18	Review response to motion to strike and conduct initial research in preparation for drafting reply in support of motion to strike.	Stefanova, Marina	0.40	246.00
08/09/18	Review draft email to opposing counsel regarding filings and service issues and review stipulation on waiver of service with	Stefanova, Marina	0.40	246.00

M Katz Page 3 September 21, 2018

<u>Date</u>	Description	<u>Timekeeper</u>	<u>Hours</u>	Amount
	respect to Y. Vinokurova.			
08/10/18	Correspond with clients and provide advice regarding service of process and response to same in several emails; correspond with opposing counsel regarding waiver of service of process and other issues; ensure delivery of stipulation regarding waiver of service to federal court.	Bookhout, James C.	0.50	375.00
08/10/18	Attention to service issues and overall case strategy.	Katz, Marc Daniel	0.40	400.00
08/10/18	Review and finalize stipulation on waiver of service with respect to Y. Vinokurova for filing.	Stefanova, Marina	0.60	369.00
08/10/18	Research basis for moving to quash summonses issued against Legis Ventures and A. Vargas.	Stefanova, Marina	0.60	369.00
08/13/18	Analyze potential motion to quash summons as to Alejandro Vargas.	Bookhout, James C.	0.20	150.00
08/13/18	Research basis for moving to quash summonses requested and issued against Legis Ventures and A. Vargas.	Stefanova, Marina	1.70	1,045.50
08/13/18	Conduct research for and draft reply in support of motion to strike Plaintiff's "First" Amended Complaint.	Stefanova, Marina	2.70	1,660.50
08/14/18	Conduct research for and draft reply in support of motion to strike Plaintiff's "First" Amended Complaint.	Stefanova, Marina	5.10	3,136.50
08/16/18	Compose and revise reply brief in support of Motion to Strike MWK's "First" Amended Complaint; analyze strategy with respect to same and revise arguments for clarity and strength; ensure delivery of same to federal court pursuant to local rules.	Bookhout, James C.	1.80	1,350.00
08/16/18	Electronically file and serve Defendants' Reply in Support of Motion to Strike; obtain file-marked copy and update electronic file.	Eason-Hall, Erica	0.40	136.00
08/16/18	Preparation of reply in support of motion to strike; attention to overall case strategy issues.	Katz, Marc Daniel	0.80	800.00
08/16/18	Conduct follow-up research for and review and revise reply in support of motion to strike amended complaint.	Stefanova, Marina	2.90	1,783.50
08/17/18	Analyze response to opposing counsel's request to hold 26(f) conference and start discovery pursuant to local rules.	Bookhout, James C.	0.30	225.00

M Katz
Matter # 422483-000001
Page 4
Invoice # 3660830
September 21, 2018

<u>Date</u>	<u>Description</u>	<u>Timekeeper</u>	<u>Hours</u>	Amount
08/17/18	Preparation of proposed status report and discovery plan for Rule 26(f) conference.	Katz, Marc Daniel	0.70	700.00
08/17/18	Research local rules regarding timing of scheduling conference, to be used in communications with opposing counsel regarding his request for conference.	Stefanova, Marina	0.20	123.00
08/20/18	Correspond with opposing counsel regarding possible scheduling conference under local rules.	Bookhout, James C.	0.30	225.00
08/21/18	Analyze status of issuance of service of process as to Legis Ventures and Alejandro Vargas and correspond with client in several emails with advice regarding same.	Bookhout, James C.	0.70	525.00
08/21/18	Attention to matters regarding proposed status report and discovery plan; attention to strategy matters regarding discovery and summary judgment motions.	Katz, Marc Daniel	1.40	1,400.00
08/24/18	Receipt and review of Kinney's response to motion to dismiss and attention to issues related thereto; attention to case status and service of process issues.	Katz, Marc Daniel	1.50	1,500.00
08/25/18	Attention to case status issues and Hong Kong service of process issues.	Katz, Marc Daniel	0.30	300.00
08/27/18	Analyze and review response to Motion to Dismiss; analyze strategy with respect to same; correspond with opposing counsel regarding extension of time to file reply brief.	Bookhout, James C.	0.80	600.00
08/27/18	Attention to matters regarding preparation of reply brief in support of motion to dismiss.	Katz, Marc Daniel	1.00	1,000.00
08/27/18	Review and analyze response to motion to dismiss and accompanying exhibits in preparation for drafting reply.	Stefanova, Marina	1.70	1,045.50
08/27/18	Conduct research for and prepare outline of reply in support of motion to dismiss.	Stefanova, Marina	2.10	1,291.50
08/27/18	Prepare motion to extend deadline to file reply in support of motion to dismiss and proposed order.	Stefanova, Marina	0.80	492.00
08/27/18	Review filings regarding service on Legis and A. Vargas and determine answer deadline and any irregularities in service.	Stefanova, Marina	0.50	307.50
08/28/18	Finalize and ensure delivery of motion to extend time to file reply brief to court.	Bookhout, James C.	0.20	150.00

M Katz
Matter # 422483-000001
Page 5
Invoice # 3660830
September 21, 2018

Date	<u>Description</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
08/28/18	Receive instruction and finalize and electronically file Unopposed Motion to Extend Deadline to File Reply in Support of Motion to Dismiss and proposed Order with Court and serve counsel; obtain file-marked copy and update electronic file; correspondence regarding same.	Eason-Hall, Erica	0.70	238.00
08/28/18	Conduct research for and prepare draft of reply in support of motion to dismiss.	Stefanova, Marina	5.30	3,259.50
08/29/18	Analyze response brief and discuss responsive arguments for reply with M. Stefanova.	Bookhout, James C.	0.60	450.00
08/29/18	Review order granting Motion to Extend Deadline to File Reply in Support of Renewed Motion to Dismiss and docket new deadline; obtain file-marked copies of all recent pleadings and update electronic file; calculate and docket deadlines for Vinokurova, Vargas and Legis Ventures to Respond to Complaint.	Eason-Hall, Erica	1.30	442.00
08/29/18	Conduct research for and prepare draft of reply in support of motion to dismiss.	Stefanova, Marina	6.90	4,243.50
08/30/18	Analyze and revise draft reply brief in support of Motion to Dismiss; compose analysis of remaining required revisions to same.	Bookhout, James C.	1.30	975.00
08/30/18	Conduct research for and prepare draft of reply in support of motion to dismiss.	Stefanova, Marina	2.10	1,291.50
08/31/18	Conduct follow-up research for and revise reply in support of motion to dismiss.	Stefanova, Marina	3.00	1,845.00
Total Hours				60.20
Total Fees				40,474.50
	Less 20	0% Discount		(8,094.90)
Total Current Fees				32,379.60

M Katz
Matter # 422483-000001
Page 6
Invoice # 3660830
September 21, 2018

Time Summary

The following legal services were provided by DLA Piper LLP (US):

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Katz, Marc Daniel	Partner	7.70	1000.00	7,700.00
Bookhout, James C.	Associate	8.70	750.00	6,525.00
Stefanova, Marina	Associate	41.30	615.00	25,399.50
Eason-Hall, Erica	Paralegal	2.50	340.00	850.00
	Totals	60.20		40,474.50

Total Current Charges

USD 32,379.60

DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central

September 21, 2018

M Katz

Hong Kong China

Matter # 422483-000001 Invoice # 3660830

REMITTANCE ADVICE

Fees		40,474.50
Less 20% Discount		(8,094.90)
Current Fees		32,379.60
Current Disbursements		0.00
Total This Invoice	USD	32,379.60

PAYMENT DUE NO LATER THAN October 22, 2018 PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

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P.O. Box 75190 Baltimore, MD 21275

Wells Fargo Bank, N.A. Or wire remittance to:

1300 I Street, NW, 11th Floor West Tower Washington, DC 20005

Redacted

Account Name: DLA Piper LLP (US) Account No.: Redacted ABA Transit No.: Redacted Swift Code: Redacted

Law Firm Tax Identification Number:

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DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China

October 18, 2018

M Katz Matter # 422483-000001 Invoice # 3674504

For Professional Services Through September 30, 2018

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Employment law advice; File No.: *Matter:*

00394055-000001

Fees 71,370.50 Less 20% Discount (14,274.10)Current Fees 57,096.40 **Current Disbursements** 0.00 **Total This Invoice** USD 57,096.40 **Prior Outstanding** 32,379.60 Balance **Total Account Balance** USD 89,476.00

Please send remittance to: DLA Piper LLP (US)

P.O. Box 75190 Baltimore, MD 21275

Or wire remittance to: Wells Fargo Bank, N.A.

1300 I Street, NW, 11th Floor West Tower Washington, DC 20005

Account Name: DLA Piper LLP (US) Account No.: Redacted ABA Transit No.: Redacted Swift Code: Redacted

Redacted Law Firm Tax Identification Number:

To ensure proper credit, please indicate the invoice number you are paying on the wire

M Katz
Matter # 422483-000001
Page 2
Invoice # 3674504
October 18, 2018

Fees:

<u>Date</u>	Description	<u>Timekeeper</u>	<u>Hours</u>	Amount
09/04/18	Analysis of issues regarding reply in support of motion to dismiss and matters with respect to preparation of same.	Katz, Marc Daniel	0.60	600.00
09/05/18	Compose and revise reply brief in support of Motion to Dismiss for strength of argument and clarity; correspond with clients concerning same.	Bookhout, James C.	2.40	1,800.00
09/06/18	Compose and revise reply brief in support of Motion to Dismiss claims against Jowers and Legis Ventures; conference with E. Jowers concerning allegations of evasion of service; review and approve additional language to address evasion of service; correspond with E. Jowers in multiple emails concerning same.	Bookhout, James C.	1.80	1,350.00
09/06/18	Attention to matters regarding preparation of reply brief in support of motion to dismiss.	Katz, Marc Daniel	1.00	1,000.00
09/06/18	Review E. Jowers's comments on reply in support of motion to dismiss and review and revise reply.	Stefanova, Marina	4.00	2,460.00
09/06/18	Conduct research for and draft Vargas's motion to dismiss MWK's claims against him.	Stefanova, Marina	1.20	738.00
09/07/18	Receive instruction regarding reply in support of Defendants's renewed Motion to Dismiss to file; finalize and electronically file same with court and serve counsel; obtain file-marked copy and update electronic file.	Eason-Hall, Erica	0.50	170.00
09/07/18	Attention to matters regarding preparation of brief for reply in support of motion to dismiss; attention to overall case strategy issues.	Katz, Marc Daniel	1.00	1,000.00
09/07/18	Proof and finalize reply in support of motion to dismiss for filing.	Stefanova, Marina	0.30	184.50
09/07/18	Conduct research for and draft Vargas's motion to dismiss MWK's claims against him.	Stefanova, Marina	3.80	2,337.00
09/08/18	Conduct research for and draft Vargas's motion to dismiss MWK's claims against him.	Stefanova, Marina	0.50	307.50
09/09/18	Conduct research for and draft Vargas's	Stefanova, Marina	4.80	2,952.00

M Katz Page 3 October 18, 2018

<u>Date</u>	<u>Description</u>	<u>Timekeeper</u>	<u>Hours</u>	Amount
	motion to dismiss MWK's claims against him.			
09/10/18	Correspond with E. Jowers regarding Reply in Support of Motion to Dismiss; compose and revise Declaration of Alejandro Vargas to incorporate additional statements in favor of arguments for lack of personal jurisdiction; correspond with A. Vargas regarding Declaration and provide counsel regarding same.	Bookhout, James C.	1.60	1,200.00
09/10/18	Conduct research for and draft Vargas's motion to dismiss MWK's claims against him.	Stefanova, Marina	7.90	4,858.50
09/11/18	Conference with A. Vargas regarding Declaration in support of Motion to Dismiss; compose and revise Declaration of Alejandro Vargas to incorporate comments from client and correspond with A. Vargas concerning same; correspond with opposing counsel concerning required conference regarding increase in page limit; review and revise motion to dismiss to improve standing arguments, objection to personal jurisdiction, objection to improper service of process, and arguments regarding failure to state a claim.	Bookhout, James C.	4.30	3,225.00
09/11/18	Receive instruction and file Motion to Extend Page Limit and proposed Order regarding Dispositive Motion with Court; obtain file-marked copy of same and serve on counsel; update electronic file.	Eason-Hall, Erica	0.50	170.00
09/11/18	Review and take notes on A. Vargas comments to draft declaration and related communications in preparation for call with A. Vargas.	Stefanova, Marina	0.60	369.00
09/11/18	Take notes on call with A. Vargas and J. Bookhout regarding statements in A. Vargas declaration.	Stefanova, Marina	0.70	430.50
09/11/18	Conduct follow-up research for and revise Vargas's motion to dismiss and accompanying declaration of A. Vargas.	Stefanova, Marina	6.30	3,874.50
09/11/18	Draft motion to extend page limit of Vargas's motion to dismiss and accompanying proposed order and finalize for filing.	Stefanova, Marina	0.50	307.50
09/12/18	Compose and revise Motion to Dismiss	Bookhout, James C.	3.10	2,325.00

M Katz Page 4 October 18, 2018

<u>Date</u>	<u>Description</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
	sections regarding objections to lack of standing and personal jurisdiction; correspond with A. Vargas concerning same; review comments to Declaration from A. Vargas and analyze necessary changes to same; correspond with A. Vargas in several emails regarding Declaration and strategy regarding Motion to Dismiss; review comments to Motion to Dismiss from A. Vargas and analyze necessary changes to same.			
09/12/18	Review Order granting Motion to Increase Page Limit on Dispositive Motion and update electronic file.	Eason-Hall, Erica	0.10	34.00
09/12/18	Conduct follow up research and revisions of Vargas's motion to dismiss.	Stefanova, Marina	4.70	2,890.50
09/12/18	Review additional edits to Vargas declaration, analyze changes, and incorporate changes.	Stefanova, Marina	1.60	984.00
09/13/18	Review and revise declaration of Alejandro Vargas with additional comments from client; correspond with A. Vargas in several emails regarding status of declaration; compose and revise Motion to Dismiss; confer with M. Stefanova and ensure completion of final motion pursuant to local requirements.	Bookhout, James C.	3.40	2,550.00
09/13/18	Attention to matters regarding preparation of declaration in support of motion to dismiss; attention to briefing in support of motion to dismiss and overall case strategy.	Katz, Marc Daniel	0.80	800.00
09/13/18	Review and revise declaration of A. Vargas.	Stefanova, Marina	1.30	799.50
09/13/18	Review and revise Vargas's motion to dismiss.	Stefanova, Marina	2.70	1,660.50
09/13/18	Proof and finalize motion to dismiss for filing.	Stefanova, Marina	0.40	246.00
09/14/18	Obtain and review Vargas's Motion to Dismiss; update electronic file and calculate Plaintiff's response deadline; correspondence regarding same.	Eason-Hall, Erica	0.20	68.00
09/17/18	Review and analyze declarations of Jowers and Vargas and note any potential items needing clarification.	Stefanova, Marina	0.90	553.50
09/17/18	Conduct research for and prepare Y. Vinokurova's motion to dismiss and	Stefanova, Marina	4.20	2,583.00

M Katz Page 5 October 18, 2018

<u>Date</u>	Description	<u>Timekeeper</u>	Hours	Amount
	declaration in support.			
09/18/18	Correspond with opposing counsel regarding briefing and page limits; analyze status of Motion to Dismiss with respect to Yuliya Vinokurova and salient issues for same; compose and revise draft motion for entry of briefing schedule.	Bookhout, James C.	0.70	525.00
09/18/18	Draft motion for briefing schedule and proposed order regarding Vargas's and Vinokurova's motions to dismiss.	Stefanova, Marina	0.90	553.50
09/18/18	Conduct research for and prepare Y. Vinokurova's motion to dismiss and declaration in support.	Stefanova, Marina	3.80	2,337.00
09/19/18	Compose and revise draft briefing schedule for various motions, responses, and replies; correspond with opposing counsel to obtain agreement to same; ensure delivery to court.	Bookhout, James C.	0.40	300.00
09/19/18	Proof, finalize and file agreed motion for briefing schedule on Vargas and Vinokurova's motions to dismiss.	Stefanova, Marina	0.40	246.00
09/19/18	Conduct research for and prepare Y. Vinokurova's motion to dismiss and declaration in support.	Stefanova, Marina	2.70	1,660.50
09/20/18	Compose and revise Declaration of Yuliya Vinokurova for clarity and to add factual statements to support jurisdictional arguments in Motion to Dismiss; correspond with Y. Vinokurova regarding same.	Bookhout, James C.	2.30	1,725.00
09/20/18	Conduct research for and prepare Y. Vinokurova's motion to dismiss and declaration in support.	Stefanova, Marina	6.50	3,997.50
09/21/18	Review and assess Y. Vinokurova's comments and edits to declaration in support of motion to dismiss.	Stefanova, Marina	0.30	184.50
09/24/18	Analyze and revise Declaration of Yuliya Vinokurova and correspond with Y. Vinokurova concerning same; compose and revise Motion to Dismiss on behalf of Yuliya Vinokurova to improve arguments and clarity.	Bookhout, James C.	2.10	1,575.00
09/24/18	Attention to matters regarding preparation of declaration in support of motion to dismiss.	Katz, Marc Daniel	0.30	300.00
09/24/18	Review and incorporate Vinokurova's comments into declaration and Motion to	Stefanova, Marina	1.90	1,168.50

M Katz Page 6 October 18, 2018

<u>Date</u>	<u>Description</u> Dismiss.	<u>Timekeeper</u>	<u>Hours</u>	Amount
09/25/18	Compose and revise Motion to Dismiss all claims against Y. Vinokurova; correspond with Y. Vinokurova and E. Jowers regarding allegations in Declaration in support of Motion to Dismiss; correspond with opposing counsel regarding dispute related to whether scheduling order and conference are proper.	Bookhout, James C.	3.10	2,325.00
09/25/18	Review and incorporate Vinokurova's comments into motion to dismiss and declaration and make additional revisions.	Stefanova, Marina	1.20	738.00
09/26/18	Continue to compose and revise Motion to Dismiss claims against Y. Vinokurova to improve standing and personal jurisdiction arguments; analyze additional necessary revisions to Declaration of Y. Vinokurova in support of Motion to Dismiss.	Bookhout, James C.	2.60	1,950.00
09/26/18	Touch base regarding case status and next steps; obtain and review court orders extending briefing deadlines and requirements; update electronic file and docket with same; coordinate regarding response to be filed.	Eason-Hall, Erica	0.40	136.00
09/26/18	Proof and revise motion to dismiss.	Stefanova, Marina	0.90	553.50
09/26/18	Review and incorporate Vinokurova's comments into motion to dismiss and declaration and conduct research for additional revisions.	Stefanova, Marina	4.80	2,952.00
09/27/18	Compose and finalize Motion to Dismiss of Yuliya Vinokurova; finalize required supporting documents; ensure delivery to court pursuant to required local procedures.	Bookhout, James C.	1.70	1,275.00
09/27/18	Receive instruction regarding Vinokurova's Motion to Dismiss to file with Court; finalize motion with exhibits for filing; electronically file same with court; obtain file-marked pleading and serve counsel; update electronic file.	Eason-Hall, Erica	0.80	272.00
09/27/18	Finalized motion to dismiss and brief in support on behalf of Vinakunova.	Katz, Marc Daniel	0.80	800.00
09/28/18	Analyze proposed scheduling order from Kinney filed with court; revise and ensure delivery of motion requesting extension of time to respond to proposed scheduling order.	Bookhout, James C.	0.40	300.00

M Katz
Matter # 422483-000001
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Invoice # 3674504
October 18, 2018

<u>Date</u>	Description	Timekeeper	Hours	Amount
09/28/18	Obtain and review MWK's Proposed Scheduling Order and update electronic file; receive instruction and finalize and electronically file Motion to Extend Deadline to Respond to Motion for Scheduling Order with Court; obtain filemarked pleading and serve same on counsel; update electronic file.	Eason-Hall, Erica	0.70	238.00
09/28/18	Review MWK's motion for scheduling order and draft motion to extend deadline.	Stefanova, Marina	0.70	430.50
	Total H	ours		108.10
	Total Fo	ees		71,370.50
	Less 20	0% Discount		(14,274.10)
	Total (Current Fees		57,096.40

Time Summary

The following legal services were provided by DLA Piper LLP (US):

<u>Timekeeper</u>	<u>Title</u>	Hours	Rate	Amount
Katz, Marc Daniel	Partner	4.50	1000.00	4,500.00
Bookhout, James C.	Associate	29.90	750.00	22,425.00
Stefanova, Marina	Associate	70.50	615.00	43,357.50
Eason-Hall, Erica	Paralegal	3.20	340.00	1,088.00
	Totals	108.10		71,370.50

Total Current Charges <u>USD 57,096.40</u>

DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central

October 18, 2018

M Katz

Hong Kong China

Matter # 422483-000001 Invoice # 3674504

REMITTANCE ADVICE

Fees	71,370.50
Less 20% Discount	(14,274.10)
Current Fees	57,096.40
Current Disbursements	0.00
Total This Invoice	USD 57,096.40

Outstanding Invoice Summary

Date	Invoice	Amount	Payments/Adjustments	Balance
09/21/18	3660830	32,379.60	0.00	32,379.60
		Prior Outstanding	g Balance	32,379.60
		Total Accoun	t Balance USD	89,476.00

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DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China November 21, 2018

M. Katz Matter # 422483-000001 Invoice # 3691203

For Professional Services Through October 31, 2018

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Matter: Employment law advice; File No.:

00394055-000001

Fees 34,472.00 Less 20% Discount (6,894.40)**Current Fees** 27,577.60 **Current Disbursements** 0.00**Total This Invoice USD** 27,577.60 **Prior Outstanding** 57,096.40 Balance **Total Account Balance** USD 84,674.00

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Washington, DC 20005

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M. Katz
Matter # 422483-000001
Page 2
Invoice # 3691203
November 21, 2018

Fees:

<u>Date</u>	Description	<u>Timekeeper</u>	Hours	<u>Amount</u>
10/01/18	Obtain and review Order for Parties to Submit Joint Proposed Scheduling Order; update docket and electronic file.	Eason-Hall, Erica	0.20	68.00
10/03/18	Obtain and review Notice of Robert Kinney Pro Hac Vice application payment and update electronic file.	Eason-Hall, Erica	0.10	34.00
10/11/18	Receipt and review of plaintiffs' response to motion to dismiss and preparation of outline of issues in connection therewith.	Katz, Marc Daniel	1.00	1,000.00
10/12/18	Obtain and review Plaintiff's Response to Vargas's Motion to Dismiss and update electronic file.	Eason-Hall, Erica	0.20	68.00
10/12/18	Continued review and analysis of plaintiffs' response to motion to dismiss and analysis of issues for potential reply; attention to issues regarding court's scheduling deadlines and matters related thereto.	Katz, Marc Daniel	1.00	1,000.00
10/15/18	Correspond with opposing counsel regarding compliance with Rule 26(f) requirements and scheduling proposal.	Bookhout, James C.	0.20	150.00
10/16/18	Attention to matters regarding preparation of court-ordered discovery plan and scheduling report and correspondence with plaintiffs' counsel regarding Rule 26(f) conference.	Katz, Marc Daniel	0.40	400.00
10/18/18	Conduct research for and begin preparing motion to stay discovery.	Stefanova, Marina	0.50	307.50
10/22/18	Conduct research for and draft motion to stay discovery.	Stefanova, Marina	4.20	2,583.00
10/22/18	Review and take notes on MWK's response to Vargas's motion to dismiss.	Stefanova, Marina	1.10	676.50
10/23/18	Obtain and review Plaintiff's Response to Vinkurova's Motion to Dismiss and update electronic file; review order and confirm response deadline.	Eason-Hall, Erica	0.10	34.00
10/23/18	Review and analysis of plaintiffs' response to motion to dismiss; analysis of case strategy issues.	Katz, Marc Daniel	0.80	800.00
10/23/18	Conduct research for and draft motion to stay discovery.	Stefanova, Marina	4.10	2,521.50
10/24/18	Conference with E. Jowers concerning litigation with Robert Kinney and case strategy; provide E. Jowers with update as	Bookhout, James C.	1.20	900.00

M. Katz Page 3 November 21, 2018

<u>Date</u>	Description to pending motions and strategy with respect to same; correspond with opposing counsel regarding jurisdictional discovery; review and analyze proposed motion for jurisdictional discovery; compose response to opposing counsel setting forth why Defendants object to proposed jurisdictional discovery.	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
10/24/18	Analysis of potential counterclaims and potential lawsuit against Kinney in Hong Kong; attention to plaintiffs' demand for jurisdictional discovery and response thereto.	Katz, Marc Daniel	2.00	2,000.00
10/24/18	Conduct research for and draft reply in support of Vargas's motion to dismiss.	Stefanova, Marina	0.70	430.50
10/25/18	Analyze arguments for Response to MWK's Motion for Jurisdictional Discovery; review proposed scheduling order received from opposing counsel and revise to provide alternative, more convenient dates; compose and revise Motion to Stay Discovery to be filed in the event of service of discovery requests and in anticipation of Rule 26(f) conference.	Bookhout, James C.	1.90	1,425.00
10/25/18	Obtain and review Plaintiff's Motion for Discovery Regarding Personal Jurisdiction; calculate and docket response deadline and update electronic file.	Eason-Hall, Erica	0.20	68.00
10/25/18	Attention to strategy issues regarding suit in Hong Kong versus counterclaims here and analysis of substantive case issues with respect thereto.	Katz, Marc Daniel	0.70	700.00
10/25/18	Review and take notes on MWK's response to Vinokurova's motion to dismiss.	Stefanova, Marina	0.50	307.50
10/25/18	Review and analyze MWK's motion for jurisdictional discovery.	Stefanova, Marina	0.20	123.00
10/25/18	Call with J. Bookhout to discuss strategy for responding to motion for jurisdictional discovery and request for stay of all discovery.	Stefanova, Marina	0.30	184.50
10/26/18	Conference with opposing counsel pursuant to court order and Fed. R. Civ. P. 26(f); analyze local rules regarding potential motion to stay discovery and analyze strategy with respect to same; correspond with client regarding questions as to certain	Bookhout, James C.	0.70	525.00

M. Katz Page 4 November 21, 2018

<u>Date</u>	<u>Description</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
	facts alleged by Robert Kinney.			
10/26/18	Obtain and review Joint Proposed Scheduling Order submitted to court and update electronic file.	Eason-Hall, Erica	0.10	34.00
10/26/18	Review and revise motion to stay discovery.	Stefanova, Marina	0.60	369.00
10/26/18	Conduct research for and draft reply in support of Vargas's motion to dismiss.	Stefanova, Marina	5.90	3,628.50
10/26/18	Call with J. Bookhout and opposing counsel R. Mort to discuss scheduling and discovery issues, and conduct follow-up research on timing of discovery.	Stefanova, Marina	0.60	369.00
10/27/18	Conference with E. Jowers regarding case status and strategy.	Bookhout, James C.	0.80	600.00
10/28/18	Conduct research for and draft reply in support of Vargas's motion to dismiss.	Stefanova, Marina	1.70	1,045.50
10/28/18	Conduct research for and draft reply in support of Vinokurova's motion to dismiss.	Stefanova, Marina	2.60	1,599.00
10/29/18	Conduct research for and draft reply in support of Vinokurova's motion to dismiss.	Stefanova, Marina	0.80	492.00
10/29/18	Review and revise reply in support of Vargas's motion to dismiss.	Stefanova, Marina	0.60	369.00
10/29/18	Conduct research for and draft response to MWK's motion for jurisdictional discovery.	Stefanova, Marina	2.60	1,599.00
10/30/18	Compose and revise Response to Motion for Jurisdictional Discovery; compose and revise Reply in support of Motion to Dismiss claims against Alejandro Vargas; compose and revise Reply in support of Motion to Dismiss claims against Yuliya Vinokurova.	Bookhout, James C.	4.70	3,525.00
10/30/18	Preparation of brief in support of motion to dismiss.	Katz, Marc Daniel	0.60	600.00
10/30/18	Conduct research for and draft response to MWK's motion for jurisdictional discovery.	Stefanova, Marina	2.20	1,353.00
10/30/18	Review and revise response to MWK's motion for jurisdictional discovery and prepare proposed order.	Stefanova, Marina	0.60	369.00
10/31/18	Compose and finalize Response to Motion for Jurisdictional Discovery; ensure delivery to court in compliance with local rules and procedures; review draft Reply briefs of Alejandro Vargas and Yuliya Vinokurova and correspond with clients concerning same.	Bookhout, James C.	0.90	675.00

M. Katz
Matter # 422483-000001
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Invoice # 3691203
November 21, 2018

<u>Date</u>	Description	Timekeeper	<u>Hours</u>	<u>Amount</u>
10/31/18	Receive instruction regarding response to motion for jurisdictional discovery to file with court; electronically file same with court and serve counsel; obtain file-marked copy and update electronic file.	Eason-Hall, Erica	0.50	170.00
10/31/18	Preparation of briefing for reply and supporting motion to dismiss and attention to overall case strategy.	Katz, Marc Daniel	1.00	1,000.00
10/31/18	Review and revise Vargas's reply in support of motion to dismiss.	Stefanova, Marina	0.60	369.00
	Total H	ours		49.70
Total Fees				34,472.00
	Less 20% Discount			(6,894.40)
	Total C	Current Fees		27,577.60

Time Summary

The following legal services were provided by DLA Piper LLP (US):

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	Rate	Amount
Katz, Marc Daniel	Partner	7.50	1000.00	7,500.00
Bookhout, James C.	Associate	10.40	750.00	7,800.00
Stefanova, Marina	Associate	30.40	615.00	18,696.00
Eason-Hall, Erica	Paralegal	1.40	340.00	476.00
	Totals	49.70		34,472.00

Total Current Charges

USD 27,577.60

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M. Katz

November 21, 2018

Matter # 422483-000001 Invoice # 3691203

REMITTANCE ADVICE

Fees		34,472.00
Less 20% Discount		(6,894.40)
Current Fees		27,577.60
Current Disbursements		0.00
Total This Invoice	USD	27,577.60

Outstanding Invoice Summary

Date	Invoice	Amount	Payments/Adjustments	Balance
10/18/18	3674504	57,096.40	0.00	57,096.40
		Prior Outstandin	g Balance	57,096.40
		Total Accour	nt Balance USD	84,674.00

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Matter # 422483-000001
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Invoice # 3691203
November 21, 2018



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1717 Main Street
Dallas, TX 75201-4605

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DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China December 12, 2018

M. Katz Matter # 422483-000001 Invoice # 3703196

For Professional Services Through November 30, 2018

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Matter: Employment law advice; File No.:

00394055-000001

Fees 15,871.50 Less 20% Discount (3,174.30)**Current Fees** 12,697.20 **Current Disbursements** 0.00**Total This Invoice** USD 12,697.20 **Prior Outstanding** 84,674.00 Balance **Total Account Balance** USD 97,371.20

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M. Katz
Matter # 422483-000001
Page 2
Invoice # 3703196
December 12, 2018

Fees:

<u>Date</u>	Description	Timekeeper	Hours	Amount
11/01/18	Analyze comments from A. Vargas to Reply brief in support of the Motion to Dismiss and determine prudent edits to incorporate same; correspond with A. Vargas concerning his comments to the Reply brief.	Bookhout, James C.	0.30	225.00
11/01/18	Attention to matters regarding preparation of brief in support of reply in support of motion to dismiss.	Katz, Marc Daniel	0.40	400.00
11/02/18	Compose, review, and finalize Reply brief in support of Alejandro Vargas's Motion to Dismiss; compose, review, and finalize Reply brief in support of Yuliya Vinokurova's Motion to Dismiss; ensure compliance with local rules and procedures in delivery to court.	Bookhout, James C.	1.20	900.00
11/02/18	Receive instruction regarding reply briefs in support of Defendants' motions to dismiss to be filed with Court; review and finalize Vargas's Reply in Support of Motion to Dismiss and Vinokurova's Reply in Support of Motion to Dismiss; electronically file same and proposed Orders with Court; obtain court conformed copies and serve same on opposing counsel; update electronic file.	Eason-Hall, Erica	1.10	374.00
11/02/18	Review and revise reply in support of Vargas's motion to dismiss.	Stefanova, Marina	0.50	307.50
11/06/18	Obtain and review Order Setting Pretrial Conference, docket same, and update electronic file.	Eason-Hall, Erica	0.20	68.00
11/06/18	Review and analysis of court order scheduling pre-trial conference and attention thereto.	Katz, Marc Daniel	0.20	200.00
11/08/18	Obtain and review MWK's Reply to Response to Motion for Personal Jurisdiction Discovery and update electronic file.	Eason-Hall, Erica	0.10	34.00
11/08/18	Attention to court-ordered pretrial conference and preparation of outline of issues in connection therewith.	Katz, Marc Daniel	0.40	400.00
11/08/18	Review and take notes on MWK's reply in support of motion for jurisdictional discovery.	Stefanova, Marina	0.10	61.50
11/08/18	Prepare defendants' initial disclosures.	Stefanova, Marina	1.40	861.00

M. Katz
Matter # 422483-000001
Page 3
Invoice # 3703196
December 12, 2018

<u>Date</u>	Description	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
11/09/18	Compose and revise initial Rule 26(a) disclosures in litigation and finalize according to federal rules.	Bookhout, James C.	0.80	600.00
11/09/18	Coordinate regarding Defendants' Rule 26(a) Initial Disclosures; draft correspondence to opposing counsel and serve same; update electronic file.	Eason-Hall, Erica	0.30	102.00
11/09/18	Attention to matters regarding preparation of Rule 26 disclosures.	Katz, Marc Daniel	0.50	500.00
11/09/18	Review and finalize initial disclosures.	Stefanova, Marina	0.20	123.00
11/13/18	Review pretrial conference telephone hearing logistics and update docket to reflect same.	Eason-Hall, Erica	0.10	34.00
11/14/18	Analyze case status in preparation for scheduling conference with court; analyze and determine strategy with respect to Motion to Disqualify Robert Kinney.	Bookhout, James C.	0.60	450.00
11/14/18	Review and analysis of plaintiff's initial disclosures; attention to follow up on discovery requests a d discovery strategy.	Katz, Marc Daniel	0.70	700.00
11/15/18	Obtain and review minute entry order regarding pretrial conference and obtain and review Scheduling Order; update electronic file.	Eason-Hall, Erica	0.20	68.00
11/15/18	Attention to pretrial conference and court's deadline for submission of scheduling order and discovery plan.	Katz, Marc Daniel	1.00	1,000.00
11/15/18	Prepare for and take notes on initial scheduling conference with the Court.	Stefanova, Marina	0.50	307.50
11/16/18	Review Scheduling Order and Western District of Texas Local Rules regarding pretrial deadlines; calculate and docket scheduling order and pretrial deadlines.	Eason-Hall, Erica	2.30	782.00
11/20/18	Review and analyze jury waiver provisions in all contracts at issue in case in preparation for assessment of whether to seek to strike jury demand.	Stefanova, Marina	0.70	430.50
11/21/18	Conduct research for and draft motion to disqualify R. Kinney as counsel for Plaintiff.	Stefanova, Marina	3.90	2,398.50
11/27/18	Conduct research for and draft motion to disqualify R. Kinney as counsel for Plaintiff and prepare proposed order.	Stefanova, Marina	3.00	1,845.00
11/28/18	Compose and revise Motion to Disqualify	Bookhout, James C.	1.20	900.00

M. Katz
Matter # 422483-000001
Page 4
Invoice # 3703196
December 12, 2018

<u>Date</u>	<u>Description</u>	<u>Timekeeper</u>	<u>Hours</u>	Amount
	Robert Kinney as counsel for MWK.			
11/28/18	Attention to matters regarding motion to disqualify Kinney and preparation of motion and brief in support regarding same.	Katz, Marc Daniel	1.30	1,300.00
11/29/18	Attention to disqualification matters; attention to discovery and case strategy issues.	Katz, Marc Daniel	0.50	500.00
	Total Hours			23.70
	Total Fees			15,871.50
	Less 20% Discount			(3,174.30)
	Total Current Fees			12,697.20

Time Summary

The following legal services were provided by DLA Piper LLP (US):

<u>Timekeeper</u>	Title	Hours	Rate	Amount
Katz, Marc Daniel	Partner	5.00	1000.00	5,000.00
Bookhout, James C.	Associate	4.10	750.00	3,075.00
Stefanova, Marina	Associate	10.30	615.00	6,334.50
Eason-Hall, Erica	Paralegal	4.30	340.00	1,462.00
	Totals	23.70		15,871.50

Total Current Charges <u>USD 12,697.20</u>

DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China M. Katz

December 12, 2018

Matter # 422483-000001 Invoice # 3703196

REMITTANCE ADVICE

Fees		15,871.50
Less 20% Discount		(3,174.30)
Current Fees		12,697.20
Current Disbursements		0.00
Total This Invoice	USD	12,697.20

Please be advised DLA Piper LLP (US) 2018 fiscal year ends December 31, 2018 Kindly remit payment prior to December 31, 2018 PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

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1300 I Street, NW, 11th Floor West Tower

Washington, DC 20005

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	M. Katz
Matter # 422483-000001	Page 6
Invoice # 3703196	December 12, 2018

Outstanding Invoice Summary

Date	Invoice	Amount	Payments/Adjustments	Balance
10/18/18	3674504	57,096.40	0.00	57,096.40
11/21/18	3691203	27,577.60	0.00	27,577.60
		Prior Outstandin	g Balance	84,674.00
		Total Accoun	nt Balance <u>USD</u>	97,371.20



Case 1:18-cv-00444-RP Document 406-1 Filed ի Զ/ 0-8/23 թ թց 58 of 98

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DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong

China

January 22, 2019

M. Katz Matter # 422483-000001 Invoice # 3715096

For Professional Services Through December 31, 2018

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Matter: Employment law advice; File No.:

00394055-000001

 Fees
 12,012.00

 Less 20% Discount
 (2,402.40)

 Current Fees
 9,609.60

 Current Disbursements
 0.00

 Total This Invoice
 USD
 9,609.60

Please send remittance to: DLA Piper LLP (US)

P.O. Box 75190 Baltimore, MD 21275

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Washington, DC 20005

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Swift Code: Redacted

Law Firm Tax Identification Number: Redacted

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M. Katz
Matter # 422483-000001
Page 2
Invoice # 3715096
January 22, 2019

Fees:

Date	<u>Description</u>	Timekeeper	Hours	Amount
12/04/18	Review revised version of motion to disqualify and incorporate additional revisions.	Stefanova, Marina	0.90	553.50
12/05/18	Compose and review Motion to Disqualify Robert Kinney as counsel for MWK; correspond with client to provide case status update and to discuss draft Motion to Disqualify.	Bookhout, James C.	0.90	675.00
12/06/18	Correspond with client regarding case strategy and to respond to questions regarding case status update.	Bookhout, James C.	0.30	225.00
12/06/18	Attention to general case status and strategy matters.	Katz, Marc Daniel	0.50	500.00
12/06/18	Review revised version of motion to disqualify and incorporate additional revisions.	Stefanova, Marina	0.40	246.00
12/11/18	Review discovery requests served by Robert Kinney, including written requests to E. Jowers, A. Vargas, and Y. Vinokurova, deposition notices, and subpoena to Kirkland & Ellis; analyze strategy regarding response to same and content of Motion to Stay Discovery.	Bookhout, James C.	0.40	300.00
12/11/18	Obtain and review Plaintiff's Notice regarding Magistrate Judge; update electronic file.	Eason-Hall, Erica	0.10	34.00
12/11/18	Receipt and review of Kinney's discovery requests and attention to strategy regarding objecting and responding thereto.	Katz, Marc Daniel	1.00	1,000.00
12/11/18	Review plaintiff's discovery requests and update and revise motion to stay discovery in light of discovery requests.	Stefanova, Marina	3.60	2,214.00
12/11/18	Review scheduling order and local rules and assess actions needed to comply with upcoming deadlines.	Stefanova, Marina	0.40	246.00
12/11/18	Prepare notice regarding consent to proceed before Magistrate Judge.	Stefanova, Marina	0.40	246.00
12/12/18	Review and revise draft Motion to Stay Discovery; correspond with opposing counsel to confer regarding relief requested in motion in compliance with Western District Local Rules; determine strategy with respect to Motion to Stay Discovery	Bookhout, James C.	1.40	1,050.00

M. Katz Page 3 January 22, 2019

<u>Date</u>	Description	<u>Timekeeper</u>	<u>Hours</u>	Amount
	and Motion to Disqualify; review Notice regarding proceeding before Magistrate Judge required by Court's Scheduling Order.			
12/12/18	Review and analyze plaintiff's discovery requests.	Stefanova, Marina	0.40	246.00
12/13/18	Correspond with E. Jowers, Y. Vinokurova, and A. Vargas regarding discovery requests and Motion to Stay Discovery and advice regarding same, including continued consultation regarding document preservation duties under U.S. law; respond to questions from E. Jowers regarding response to overbroad discovery requests.	Bookhout, James C.	0.60	450.00
12/13/18	Coordinate regarding filing Magistrate Consent; review deposition notices to Defendants and subpoena and deposition notice to Kirkland and Ellis and update electronic file and docketing.	Eason-Hall, Erica	0.30	102.00
12/14/18	Finalize Motion to Stay Discovery; review and revise proposed orders in support; correspond with opposing counsel regarding conference with respect to same; ensure delivery of Motion to Stay Discovery to court.	Bookhout, James C.	0.70	525.00
12/14/18	Electronically file Defendants' Notice of Non-Consent to Proceed Before Magistrate Judge; finalize and electronically file Defendants' Expedited Motion to Stay Discovery and proposed Orders; obtain file- marked copies and serve same on counsel; update electronic file.	Eason-Hall, Erica	1.00	340.00
12/14/18	Attention to matters regarding finalizing motion to stay and brief in support.	Katz, Marc Daniel	1.00	1,000.00
12/14/18	Review and revise motion to stay discovery and prepare accompanying exhibit.	Stefanova, Marina	0.70	430.50
12/17/18	Review order received from court granting stay; correspond with clients about and provide advice regarding court order.	Bookhout, James C.	0.30	225.00
12/17/18	Attention to court ordered stay and case strategy issues.	Katz, Marc Daniel	0.60	600.00
12/18/18	Obtain and review Order on Motions to Stay Discovery; update electronic file and docket accordingly; obtain Plaintiff's document production and incorporate same into electronic file.	Eason-Hall, Erica	0.60	204.00

	M. Katz
Matter # 422483-000001	Page 4
Invoice # 3715096	January 22, 2019

<u>Date</u>	Description	<u>Timekeeper</u>	Hours	Amount
12/20/18	Correspond with general counsel for Kirkland & Ellis regarding order staying discovery; correspond with assistant general counsel for Kirkland & Ellis.	Bookhout, James C.	0.30	225.00
12/21/18	Conference with assistant general counsel of Kirkland & Ellis regarding subpoena from Robert Kinney.	Bookhout, James C.	0.30	225.00
12/26/18	Review correspondence from assistant general counsel for Kirkland & Ellis LLP; correspond with assistance general counsel for Kirkland & Ellis LLP.	Bookhout, James C.	0.20	150.00
	Total H	ours		17.30
	Total Fees			12,012.00
	Less 20% Discount			(2,402.40)
Total Current Fees			9,609.60	

Time Summary

The following legal services were provided by DLA Piper LLP (US):

<u>Timekeeper</u>	<u>Title</u>	Hours	<u>Rate</u>	Amount
Katz, Marc Daniel	Partner	3.10	1000.00	3,100.00
Bookhout, James C.	Associate	5.40	750.00	4,050.00
Stefanova, Marina	Associate	6.80	615.00	4,182.00
Eason-Hall, Erica	Paralegal	2.00	340.00	680.00
	Totals	17.30		12,012.00

Total Current Charges

USD 9,609.60

DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark

January 22, 2019

M. Katz

15 Queen's Road, Central Hong Kong China

Matter # 422483-000001 Invoice # 3715096

REMITTANCE ADVICE

Fees		12,012.00
Less 20% Discount		(2,402.40)
Current Fees		9,609.60
Current Disbursements		0.00
Total This Invoice	USD	9,609.60

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P.O. Box 75190 Baltimore, MD 21275

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1300 I Street, NW, 11th Floor West Tower Washington, DC 20005

Account Name: DLA Piper LLP (US) Account No.: Redacted ABA Transit No.: Redacted Swift Code: Redacted

Law Firm Tax Identification Number: Redacted

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Case 1:18-cv-00444-RP Document 406-1 Filed ի Զ/ 0-8/23 թ թց 63 of 98

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PRIVILEGED AND CONFIDENTIAL

DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China February 12, 2019

M. Katz Matter # 422483-000001 Invoice # 3723050

For Professional Services Through January 31, 2019

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Matter: Employment law advice; File No.:

00394055-000001

Fees 2,884.00 Less 20% Discount (576.80)**Current Fees** 2,307.20 **Current Disbursements** 0.00 **Total This Invoice** USD 2,307.20 **Prior Outstanding** 9,609.60 Balance **Total Account Balance** USD 11,916.80

Please send remittance to: DLA Piper LLP (US)

P.O. Box 75190 Baltimore, MD 21275

Or wire remittance to: Wells Fargo Bank, N.A.

1300 I Street, NW, 11th Floor West Tower

Washington, DC 20005

Account Name: DLA Piper LLP (US)

Account No.: Redac ed ABA Transit No.: Redac ed Swift Code: Redac ed

Law Firm Tax Identification Number: Redac ed

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	M. Katz
Matter # 422483-000001	Page 2
Invoice # 3723050	February 12, 2019

Fees:

Date	Description	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
01/07/19	Meeting with E. Jowers regarding litigation strategy and potential employee hires from R. Kinney.	Bookhout, James C.	0.80	640.00
01/07/19	Review and analysis of case pleadings and preparation for status update with Evan Jowers; conference with Jowers regarding case strategy and issues regarding future potential hires.	Katz, Marc Daniel	0.60	648.00
01/23/19	Review order denying MWK's Motion for Jurisdictional Discovery; correspond with client concerning same and possible implications for pending Motions to Dismiss.	Bookhout, James C.	0.60	480.00
01/23/19	Obtain and review Order Denying Motion for Jurisdictional Discovery and update electronic file.	Eason-Hall, Erica	0.10	36.00
01/23/19	Review and analysis of report and recommendation from Magistrate and attention to overall case strategy issues.	Katz, Marc Daniel	1.00	1,080.00
	Total H	Iours		3.10
	Total F	ees		2,884.00
Less 20% Discount			(576.80)	
	Total	Current Fees		2,307.20

Time Summary

The following legal services were provided by DLA Piper LLP (US):

Timekeeper	Title	Hours	Rate	Amount
Katz, Marc Daniel	Partner	1.60	1080.00	1,728.00
Bookhout, James C.	Associate	1.40	800.00	1,120.00
Eason-Hall, Erica	Paralegal	0.10	360.00	36.00
	Totals	3.10		2,884,00

Total Current Charges <u>USD 2,307.20</u>

DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China

February 12, 2019

M. Katz

Matter # 422483-000001 Invoice # 3723050

REMITTANCE ADVICE

Fees		2,884.00
Less 20% Discount		(576.80)
Current Fees		2,307.20
Current Disbursements		0.00
Total This Invoice	USD	2,307.20

Outstanding Invoice Summary

<u>Date</u>	<u>Invoice</u>	Amount	Payments/Adjustments	Balance
01/22/19	3715096	9,609.60	0.00	9,609.60
		Prior Outstanding	g Balance	9,609.60
		Total Accoun	t Balance USD	11,916.80

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1300 I Street, NW, 11th Floor West Tower

Washington, DC 20005

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M. Katz
Matter # 422483-000001
Page 4
Invoice # 3723050
February 12, 2019



Case 1:18-cv-00444-RP Document 406-1 Filed ի Զ/ ԳՔ/ Ք թյցе 67 of 98

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PRIVILEGED AND CONFIDENTIAL

DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China March 07, 2019

M. Katz Matter # 422483-000001 Invoice # 3734623

For Professional Services Through February 28, 2019

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Matter: Employment law advice; File No.:

00394055-000001

Fees 6,955.00 Less 20% Discount (1,391.00)**Current Fees** 5,564.00 **Current Disbursements** 0.00 **Total This Invoice USD** 5,564.00 **Prior Outstanding** 11,916.80 Balance **Total Account Balance** USD 17,480.80

Please send remittance to: DLA Piper LLP (US)

P.O. Box 75190 Baltimore, MD 21275

Or wire remittance to: Wells Fargo Bank, N.A.

1300 I Street, NW, 11th Floor West Tower

Washington, DC 20005

Account Name: DLA Piper LLP (US)
Account No.: Redacted
ABA Transit No.: Redacted
Swift Code: Redacted

Law Firm Tax Identification Number: Redacted

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M. Katz Page 2 March 07, 2019

Fees:

<u>Date</u>	Description	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
02/21/19	Review and analyze order from court regarding evidentiary hearing on subject matter and personal jurisdiction.	Bookhout, James C.	0.50	400.00
02/21/19	Obtain and review Order Setting Evidentiary Hearing and docket associated deadlines; update electronic file.	Eason-Hall, Erica	0.20	72.00
02/21/19	Review and analysis of court order requiring document production by Robert Kinney and attention to case matters related thereto.	Katz, Marc Daniel	0.70	756.00
02/22/19	Analyze and review proposed protective order from opposing counsel; correspond with opposing counsel concerning same; develop strategy for evidentiary hearing on Motions to Dismiss.	Bookhout, James C.	0.80	640.00
02/22/19	Calculate and docket deadlines associated with Evidentiary Hearing on Personal and Subject Matter Jurisdiction and supplemental briefing.	Eason-Hall, Erica	0.20	72.00
02/22/19	Attention to matters regarding court ordered production by Kinney regarding authority of plaintiff to bring suit and preparation of outline of issues in connection with preparation for hearing set by court on same; attention to matters regarding preparation of correspondence to Kinney regarding discovery relevant to upcoming hearing.	Katz, Marc Daniel	2.00	2,160.00
02/22/19	Review and analyze order regarding hearing on jurisdictional matters and obtain sample protective order from the W.D. Tex. to compare with Kinney's proposed protective order.	Stefanova, Marina	0.30	213.00
02/25/19	Correspond with opposing counsel regarding continuance of evidentiary hearing date on Motion to Dismiss.	Bookhout, James C.	0.20	160.00
02/25/19	Obtain and review Unopposed Motion for Protective Order and Unopposed Motion to Reschedule Evidentiary Hearing; update electronic file.	Eason-Hall, Erica	0.20	72.00
02/25/19	Attention to filings by Robert Kinney and preparation for upcoming hearing; preparation of correspondence to Kinney's counsel regarding documents to be used at upcoming hearing.	Katz, Marc Daniel	1.40	1,512.00

	M. Katz
Matter # 422483-000001	Page 3
Invoice # 3734623	March 07, 2019

<u>Date</u>	Description	<u>Timekeeper</u>	Hours	Amount
02/25/19	Review order setting hearing on jurisdictional issues and discuss strategy for hearing with J. Bookhout.	Stefanova, Marina	0.20	142.00
02/26/19	Obtain and review Notice of Merger and Request to Modify Caption, Corporate Disclosure Statement and Order Granting Protective Order; update electronic file.	Eason-Hall, Erica	0.30	108.00
02/27/19	Obtain and review Order Rescheduling Evidentiary Hearing and further Order Resetting Hearings; update docket and pleadings file accordingly.	Eason-Hall, Erica	0.30	108.00
02/27/19	Preparation for upcoming evidentiary hearing.	Katz, Marc Daniel	0.50	540.00
	Total Hours			
	Total Fees Less 20% Discount			6,955.00
				(1,391.00)
Total Current Fees				5,564.00

Time Summary

The following legal services were provided by DLA Piper LLP (US):

<u>Timekeeper</u>	<u>Title</u>	Hours	Rate	Amount
Katz, Marc Daniel	Partner	4.60	1080.00	4,968.00
Bookhout, James C.	Associate	1.50	800.00	1,200.00
Stefanova, Marina	Associate	0.50	710.00	355.00
Eason-Hall, Erica	Paralegal	1.20	360.00	432.00
Totals		7.80		6,955.00

Total Current Charges

USD 5,564.00

DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark

The Landmark

March 07, 2019

15 Queen's Road, Central

Hong Kong China

Matter # 422483-000001 Invoice # 3734623

REMITTANCE ADVICE

 Fees
 6,955.00

 Less 20% Discount
 (1,391.00)

 Current Fees
 5,564.00

 Current Disbursements
 0.00

 Total This Invoice
 USD
 5,564.00

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M. Katz

	M. Katz
Matter # 422483-000001	Page 5
Invoice # 3734623	March 07, 2019

Outstanding Invoice Summary

Date	Invoice	Amount	Payments/Adjustments	Balance
01/22/19	3715096	9,609.60	0.00	9,609.60
02/12/19	3723050	2,307.20	0.00	2,307.20
Prior Outstanding Balance		Balance	11,916.80	
		Total Account	Balance <u>USD</u>	17,480.80



Case 1:18-cv-00444-RP Document 406-1 Filed 08/08/23 թ ընցе 72 of 98

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PRIVILEGED AND CONFIDENTIAL

DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China April 11, 2019

M. Katz Matter # 422483-000001 Invoice # 3751241

For Professional Services Through March 31, 2019

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Matter: Employment law advice; File No.:

00394055-000001

 Fees
 21,729.00

 Less 20% Discount
 (4,345.80)

 Current Fees
 17,383.20

 Current Disbursements
 0.00

 Total This Invoice
 USD
 17,383.20

Please send remittance to: DLA Piper LLP (US)

P.O. Box 75190 Baltimore, MD 21275

Or wire remittance to: Wells Fargo Bank, N.A.

1300 I Street, NW, 11th Floor West Tower

Washington, DC 20005

Account Name: DLA Piper LLP (US)
Account No.: Redacted
ABA Transit No.: Redacted
Swift Code: Redacted

Law Firm Tax Identification Number: Redacted

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M. Katz
Matter # 422483-000001
Page 2
Invoice # 3751241
April 11, 2019

Fees:

<u>Date</u> 03/05/19	Description Call with J. Bookhout and Judge Pitman's	<u>Timekeeper</u> Stefanova, Marina	<u>Hours</u> 0.40	<u>Amount</u> 284.00
	law clerk to discuss resetting of evidentiary hearing and begin drafting motion for continuance.			
03/06/19	Review and analysis of Kinney's supplemental briefing in opposition to motion to dismiss and attention to matters related thereto.	Katz, Marc Daniel	1.00	1,080.00
03/06/19	Draft and revise motions for continuance and for clarification regarding the order setting evidentiary hearing.	Stefanova, Marina	1.80	1,278.00
03/06/19	Review and analyze plaintiff's supplemental briefing in preparation for evidentiary hearing.	Stefanova, Marina	0.40	284.00
03/07/19	Compose and revise Motion for Continuance of evidentiary hearing; correspond with opposing counsel concerning same.	Bookhout, James C.	0.50	400.00
03/07/19	Attention to upcoming evidentiary hearing and preparation for same.	Katz, Marc Daniel	0.80	864.00
03/08/19	Revise and finalize Motion for Continuance and ensure delivery to court; correspond with opposing counsel concerning availability pursuant to instruction from court.	Bookhout, James C.	0.30	240.00
03/08/19	Receive instruction regarding motion to continue evidentiary hearing; finalize same and electronically file with court and serve counsel; obtain file-marked copy and update electronic file.	Eason-Hall, Erica	0.70	252.00
03/08/19	Call with J. Bookhout to discuss motion for clarification and plaintiff's supplemental briefing and related exhibits.	Stefanova, Marina	0.50	355.00
03/13/19	Review Order received from Court striking Plaintiff's complaint; analyze strategy in response to same.	Bookhout, James C.	0.50	400.00
03/13/19	Attention to matters concerning court's striking of plaintiff's complaint and attempts by plaintiff to file amended complaint; analysis of correspondence from plaintiff's counsel regarding case deadlines and discovery issues and preparation of response thereto.	Katz, Marc Daniel	2.00	2,160.00

M. Katz
Matter # 422483-000001
Page 3
Invoice # 3751241
April 11, 2019

<u>Date</u>	Description	<u>Timekeeper</u>	<u>Hours</u>	Amount
03/13/19	Review order on motion to strike and discuss case strategy and next steps with J. Bookhout.	Stefanova, Marina	0.40	284.00
03/14/19	Prepare motion to reurge Jowers's and Legis Ventures's motion to dismiss and to renew Vinokurova's request for dismissal.	Stefanova, Marina	1.00	710.00
03/15/19	Correspond with opposing counsel concerning next steps in litigation; review and revise draft Motion to Reurge prior Motion to Dismiss; analyze strategy and next steps with respect to Motion to Dismiss.	Bookhout, James C.	0.90	720.00
03/15/19	Discuss strategy for filing motion to re-urge with J. Bookhout, review and revise motion, and prepare proposed order.	Stefanova, Marina	1.10	781.00
03/18/19	Review Order Granting Motion to Continue Evidentiary Hearing and review Order Striking Amended Complaint; update docket and electronic file accordingly.	Eason-Hall, Erica	0.30	108.00
03/18/19	Attention to litigation strategy issues and correspondence with Kinney's counsel.	Katz, Marc Daniel	0.30	324.00
03/19/19	Develop case strategy in response to court's ruling on Motion to Strike; correspond with Ray Mort, counsel for Kinney, regarding meet and confer.	Bookhout, James C.	0.40	320.00
03/19/19	Review and revise motion to disqualify R. Kinney as plaintiff's attorney.	Stefanova, Marina	0.90	639.00
03/20/19	Prepare for conference call with clients; conference with E. Jowers, Y. Vinokurova, and A. Vargas regarding next steps in litigation and update on same; correspond with E. Jowers in two emails; conference with opposing counsel regarding various open matters and scheduling; review potential Second Amended Complaint received from opposing counsel.	Bookhout, James C.	1.90	1,520.00
03/20/19	Review order lifting stay; update electronic file; review client correspondence regarding status and next steps in litigation.	Eason-Hall, Erica	0.30	108.00
03/20/19	Attention to matters regarding Kinney's proposed amended complaint and outline of strategy issues with respect to responding thereto; attention to matters regarding preparation for conference with client regarding plaintiff's leave to seek to amend complaint and general case strategy issues.	Katz, Marc Daniel	1.20	1,296.00

M. Katz
Matter # 422483-000001
Page 4
Invoice # 3751241
April 11, 2019

<u>Date</u>	Description	Timekeeper	Hours	Amount
03/20/19	Call with E. Jowers, A. Vargas, Y. Vinokurova, and J. Bookhout regarding case status and strategic considerations.	Stefanova, Marina	0.90	639.00
03/20/19	Call with opposing counsel and J. Bookhout to discuss case status and upcoming filings and follow-up discussion with J. Bookhout.	Stefanova, Marina	0.40	284.00
03/20/19	Review and assess plaintiff's proposed amended complaint.	Stefanova, Marina	0.50	355.00
03/21/19	Continue to review proposed Second Amended Complaint; conference with E. Jowers, Y. Vinokurova, and A. Vargas regarding case strategy and possible consent to Second Amended Complaint; correspond with opposing counsel concerning consent to Second Amended Complaint and compose adjusted briefing schedule and stay of discovery; correspond with E. Jowers in several emails regarding case strategy; review and revise draft Joint ADR report required by Scheduling Order.	Bookhout, James C.	2.40	1,920.00
03/21/19	Attention to Kinney's 2nd Amended Complaint and case strategy matters.	Katz, Marc Daniel	0.50	540.00
03/21/19	Conduct research on requirement to file ADR report and review plaintiff's proposed report and related correspondence.	Stefanova, Marina	0.70	497.00
03/21/19	Review and analyze plaintiff's second amended complaint, call with clients and J. Bookhout to discuss second amended complaint, and follow-up discussion with J. Bookhout and analysis of plaintiff's proposed filings.	Stefanova, Marina	0.80	568.00
03/22/19	Conference with opposing counsel regarding agreement to Second Amended Complaint and discovery stay and briefing deadlines in return for same; correspond with clients concerning agreement.	Bookhout, James C.	0.40	320.00
03/24/19	Correspond with E. Jowers concerning case strategy.	Bookhout, James C.	0.20	160.00
03/25/19	Review and revise draft Motion for Stay, to Enter Deadlines, and Enlarge Page Limits on Defendants' Motions to Dismiss.	Bookhout, James C.	0.30	240.00
03/25/19	Obtain and review Order Granting Motion for Leave to File Second Amended Complaint and Plaintiff's Second Amended Complaint filed with Court; calculate and docket response deadline and update	Eason-Hall, Erica	0.50	180.00

M. Katz
Matter # 422483-000001
Page 5
Invoice # 3751241
April 11, 2019

<u>Date</u>	Description electronic file.	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
03/26/19	Review and revise proposed Motion to Stay and enter briefing schedule; compose and revise same; correspond with counsel for R. Kinney regarding Motion to Stay and briefing schedule.	Bookhout, James C.	0.60	480.00
03/26/19	Review and suggest edits to draft agreed motion for stay and briefing schedule and discuss with J. Bookhout.	Stefanova, Marina	0.50	355.00
03/27/19	Review court order granting Motion to Stay and enter briefing schedule; correspond with clients and provide advice regarding status of litigation and next steps and respond to inquiry from E. Jowers.	Bookhout, James C.	0.40	320.00
03/27/19	Obtain and review order setting deadlines.	Eason-Hall, Erica	0.10	36.00
03/28/19	Obtain and deliver relevant documents to litigation team in Hong Kong; compose brief overview of history of U.S. litigation for team in Hong Kong.	Bookhout, James C.	0.40	320.00
03/28/19	Obtain and review Agreed Motion to Set Briefing Deadlines and Order entered by court; docket associated deadlines and update electronic file.	Eason-Hall, Erica	0.30	108.00
	Total H	lours		27.50
Total Fees				21,729.00
	Less 20% Discount			(4,345.80)
	Total (Current Fees		17,383.20

Time Summary

The following legal services were provided by DLA Piper LLP (US):

<u>Timekeeper</u>	<u>Title</u>	Hours	<u>Rate</u>	Amount
Katz, Marc Daniel	Partner	5.80	1080.00	6,264.00
Bookhout, James C.	Associate	9.20	800.00	7,360.00
Stefanova, Marina	Associate	10.30	710.00	7,313.00
Eason-Hall, Erica	Paralegal	2.20	360.00	792.00
	Totals	27.50		21,729.00

M. Katz
Matter # 422483-000001
Page 6
Invoice # 3751241
April 11, 2019

Total Current Charges

USD 17,383.20

DLA Piper Hong Kong M. Katz

17th Floor, Edinburgh Tower The Landmark

15 Queen's Road, Central

Hong Kong China

Matter # 422483-000001 Invoice # 3751241

April 11, 2019

REMITTANCE ADVICE

Fees		21,729.00
Less 20% Discount		(4,345.80)
Current Fees		17,383.20
Current Disbursements		0.00
Total This Invoice	USD	17,383.20

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Case 1:18-cv-00444-RP Document 406-1 Filed ի Զ/ ԳՔ/ Ք թյցе 79 of 98

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DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China June 19, 2019

M. Katz Matter # 422483-000001 Invoice # 3782191

For Professional Services Through May 31, 2019

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Matter: Employment law advice; File No.:

00394055-000001

 Fees
 30,297.00

 Less 20% Discount
 (6,059.40)

 Current Fees
 24,237.60

 Current Disbursements
 0.00

 Total This Invoice
 USD
 24,237.60

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M. Katz
Matter # 422483-000001
Page 2
Invoice # 3782191
June 19, 2019

Fees:

<u>Date</u>	Description	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
05/02/19	Attention to status and strategy of Texas litigation and attention to preparation of Hong Kong litigation.	Katz, Marc Daniel	1.00	1,080.00
05/08/19	Review and analysis of MWK's response to Motion to Dismiss and preparation of outline of issues for reply brief.	Katz, Marc Daniel	1.80	1,944.00
05/09/19	Obtain and review MWK's Response to Motion to Dismiss and update electronic file.	Eason-Hall, Erica	0.20	72.00
05/10/19	Attention to issues regarding Hong Kong lawsuit and strategic issues with respect to pressuring Kinney towards resolution and preparation of outline of strategic matters for Texas lawsuit with respect thereto.	Katz, Marc Daniel	1.30	1,404.00
05/10/19	Review and analyze plaintiff's response to motion to dismiss.	Stefanova, Marina	0.80	568.00
05/13/19	Review Kinney's Response to Motion to Dismiss all claims and analyze arguments for Reply brief; conference with E. Jowers, Y. Vinokurova, and A. Vargas regarding litigation strategy and next steps.	Bookhout, James C.	1.60	1,280.00
05/13/19	Preparation of brief in support of reply in support of motion to dismiss.	Katz, Marc Daniel	1.20	1,296.00
05/14/19	Conference with E. Jowers concerning case strategy and arguments for Reply brief in support of Motion to Dismiss; continue to review Response and prepare arguments for Reply brief.	Bookhout, James C.	1.20	960.00
05/14/19	Discuss strategy for reply and potential motion for sanctions with J. Bookhout and begin research in preparation for drafting reply in support of motion to dismiss.	Stefanova, Marina	0.70	497.00
05/16/19	Conduct research for and draft reply in support of motion to dismiss.	Stefanova, Marina	0.60	426.00
05/17/19	Conduct research for and draft reply in support of motion to dismiss.	Stefanova, Marina	6.60	4,686.00
05/18/19	Draft, review, and revise reply in support of motion to dismiss.	Stefanova, Marina	1.40	994.00
05/19/19	Draft, review, and revise reply in support of motion to dismiss.	Stefanova, Marina	1.30	923.00
05/20/19	Compose and revise Reply brief in support of Motion to Dismiss all claims against defendants; analyze relevant federal law to	Bookhout, James C.	2.10	1,680.00

Matter # 422483-000001 Invoice # 3782191 M. Katz Page 3 June 19, 2019

<u>Date</u>	<u>Description</u> improve clarity and strength of arguments in	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
	Reply brief.			
05/20/19	Attention to matters regarding finalizing draft of reply brief in support of motion to dismiss.	Katz, Marc Daniel	1.30	1,404.00
05/20/19	Research merits of alter ego as basis for imputing jurisdictional contacts; e-mail summary of findings.	Lloyd, John Jacob	1.20	612.00
05/20/19	Review and revise reply in support of motion to dismiss.	Stefanova, Marina	2.60	1,846.00
05/21/19	Continue to compose and revise Reply brief in support of Motion to Dismiss; correspond with E. Jowers in several emails regarding comments to draft Reply brief.	Bookhout, James C.	1.30	1,040.00
05/21/19	Research forum selection clause ambiguity issue; research mutual mistake under Texas law; draft summary of findings for inclusion in responsive pleading.	Lloyd, John Jacob	4.00	2,040.00
05/21/19	Discuss research with J. Lloyd and review research findings on jurisdictional waiver.	Stefanova, Marina	0.90	639.00
05/22/19	Review and revise Reply brief in support of Motion to Dismiss to strengthen arguments regarding forum selection clause and personal jurisdiction; review relevant case law from Florida for inclusion in Reply brief; review and finalize Reply brief and ensure delivery to court and opposing counsel in compliance with local rules.	Bookhout, James C.	2.40	1,920.00
05/22/19	Finalize and electronically file Defendants' Reply in Support of Motion to Dismiss; obtain court-conformed copy and update electronic file; correspondence with counsel servings same.	Eason-Hall, Erica	0.50	180.00
05/22/19	Research forum-selection clause issue under Florida law; verify fidelity of citations to propositions stated in motion to be filed.	Lloyd, John Jacob	2.30	1,173.00
05/22/19	Review, revise, and incorporate additional edits into reply in support of motion to dismiss.	Stefanova, Marina	2.30	1,633.00
	Total H	lours		40.60
	Total Fees			30,297.00
	Less 20	0% Discount		(6,059.40)

M. Katz
Matter # 422483-000001
Page 4
Invoice # 3782191
June 19, 2019

Total Current Fees

24,237.60

Time Summary

The following legal services were provided by DLA Piper LLP (US):

<u>Timekeeper</u>	<u>Title</u>	Hours	Rate	Amount
Katz, Marc Daniel	Partner	6.60	1080.00	7,128.00
Bookhout, James C.	Associate	8.60	800.00	6,880.00
Stefanova, Marina	Associate	17.20	710.00	12,212.00
Lloyd, John Jacob	Associate	7.50	510.00	3,825.00
Eason-Hall, Erica	Paralegal	0.70	360.00	252.00
	Totals	40.60		30,297.00

Total Current Charges

USD 24,237.60

DLA Piper Hong Kong M. Katz 17th Floor, Edinburgh Tower

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Matter # 422483-000001 Invoice # 3782191

REMITTANCE ADVICE

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Current Disbursements		0.00
Total This Invoice	USD	24,237.60

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Case 1:18-cv-00444-RP Document 406-1 Filed ի Զ/ 0-8/23 թ թցցе 84 of 98

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China

June 19, 2019

M. Katz Matter # 422483-000001 Invoice # 3782191

For Professional Services Through May 31, 2019

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Matter: Employment law advice; File No.:

00394055-000001

Fees		30,297.00
Less 20% Discount		(6,059.40)
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M. Katz
Matter # 422483-000001
Page 2
Invoice # 3782191
June 19, 2019

Fees:

<u>Date</u>	Description	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
05/02/19	Attention to status and strategy of Texas litigation and attention to preparation of Hong Kong litigation.	Katz, Marc Daniel	1.00	1,080.00
05/08/19	Review and analysis of MWK's response to Motion to Dismiss and preparation of outline of issues for reply brief.	Katz, Marc Daniel	1.80	1,944.00
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05/19/19	Draft, review, and revise reply in support of motion to dismiss.	Stefanova, Marina	1.30	923.00
05/20/19	Compose and revise Reply brief in support of Motion to Dismiss all claims against defendants; analyze relevant federal law to	Bookhout, James C.	2.10	1,680.00

Matter # 422483-000001 Invoice # 3782191 M. Katz Page 3 June 19, 2019

<u>Date</u>	<u>Description</u> improve clarity and strength of arguments in Reply brief.	<u>Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
05/20/19	Attention to matters regarding finalizing draft of reply brief in support of motion to dismiss.	Katz, Marc Daniel	1.30	1,404.00
05/20/19	Research merits of alter ego as basis for imputing jurisdictional contacts; e-mail summary of findings.	Lloyd, John Jacob	1.20	612.00
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05/21/19	Research forum selection clause ambiguity issue; research mutual mistake under Texas law; draft summary of findings for inclusion in responsive pleading.	Lloyd, John Jacob	4.00	2,040.00
05/21/19	Discuss research with J. Lloyd and review research findings on jurisdictional waiver.	Stefanova, Marina	0.90	639.00
05/22/19	Review and revise Reply brief in support of Motion to Dismiss to strengthen arguments regarding forum selection clause and personal jurisdiction; review relevant case law from Florida for inclusion in Reply brief; review and finalize Reply brief and ensure delivery to court and opposing counsel in compliance with local rules.	Bookhout, James C.	2.40	1,920.00
05/22/19	Finalize and electronically file Defendants' Reply in Support of Motion to Dismiss; obtain court-conformed copy and update electronic file; correspondence with counsel servings same.	Eason-Hall, Erica	0.50	180.00
05/22/19	Research forum-selection clause issue under Florida law; verify fidelity of citations to propositions stated in motion to be filed.	Lloyd, John Jacob	2.30	1,173.00
05/22/19	Review, revise, and incorporate additional edits into reply in support of motion to dismiss.	Stefanova, Marina	2.30	1,633.00
	Total H	lours		40.60
Total Fees				30,297.00
Less 20% Discount				(6,059.40)

M. Katz
Matter # 422483-000001
Page 4
Invoice # 3782191
June 19, 2019

Total Current Fees

24,237.60

Time Summary

The following legal services were provided by DLA Piper LLP (US):

<u>Timekeeper</u>	<u>Title</u>	Hours	<u>Rate</u>	Amount
Katz, Marc Daniel	Partner	6.60	1080.00	7,128.00
Bookhout, James C.	Associate	8.60	800.00	6,880.00
Stefanova, Marina	Associate	17.20	710.00	12,212.00
Lloyd, John Jacob	Associate	7.50	510.00	3,825.00
Eason-Hall, Erica	Paralegal	0.70	360.00	252.00
	Totals	40.60		30,297.00

Total Current Charges

USD 24,237.60

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Matter # 422483-000001 Invoice # 3782191

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Fees		30,297.00
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Total This Invoice	USD	24,237.60

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DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China August 13, 2019

M. Katz Matter # 422483-000001 Invoice # 3806473

For Professional Services Through July 31, 2019

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Matter: Employment law advice; File No.:

00394055-000001

Fees 8,477.00 Less 20% Discount (1,695.40)**Current Fees** 6,781.60 **Current Disbursements** 347.03 **Total This Invoice USD** 7,128.63 **Prior Outstanding** 3,121.73 Balance **Total Account Balance** USD 10,250.36

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M. Katz
Matter # 422483-000001
Page 2
Invoice # 3806473
August 13, 2019

Fees:

<u>Date</u>	Description	Timekeeper	Hours	<u>Amount</u>	
07/03/19	Correspond with clients concerning conversation with Ray Mort, counsel for R. Kinney.	Bookhout, James C.	0.20	160.00	
07/11/19	Conference with E. Jowers regarding potential communication with R. Kinney and strategy with respect to same and with respect to litigation in both Texas and Hong Kong.	Bookhout, James C.	0.50	400.00	
07/26/19	Obtain current court docket sheet to determine status of ruling on motion to dismiss.	Eason-Hall, Erica	0.10	36.00	
07/30/19	Review and analyze Order on Motion to Dismiss; correspond with clients concerning same and providing advice regarding next steps; conference with E. Jowers and Y. Vinokurova regarding litigation strategy and advice regarding arguments in lawsuit.	Bookhout, James C.	2.60	2,080.00	
07/30/19	Obtain and review Court's Order on Motion to Dismiss; update electronic file; calculate and docket triggered deadline for submission of new scheduling order.	Eason-Hall, Erica	0.20	72.00	
07/30/19	Attention to court's order on motion to dismiss; attention to case strategy issues going forward and matters related thereto.	Katz, Marc Daniel	1.50	1,620.00	
07/31/19	Provide advice to E. Jowers in response to questions concerning litigation and requesting additional information; analyze potential legal defenses and counterclaims.	Bookhout, James C.	1.30	1,040.00	
07/31/19	Attention to case strategy and summary judgment issues; attention to discovery plan.	Katz, Marc Daniel	1.00	1,080.00	
07/31/19	Review all pleadings; analyze court's order on motion to dismiss; strategize regarding client's answer to Plaintiff's Second Amended Complaint; begin gathering factual background.	Lloyd, John Jacob	3.90	1,989.00	
	Total H	ours		11.30	
	Total Fees				
	Less 20% Discount				
Total Current Fees				6,781.60	

M. Katz
Matter # 422483-000001
Page 3
Invoice # 3806473
August 13, 2019

Time Summary

The following legal services were provided by DLA Piper LLP (US):

Timekeeper	Title	Hours	Rate	Amount
Katz, Marc Daniel	Partner	2.50	1080.00	2,700.00
Bookhout, James C.	Associate	4.60	800.00	3,680.00
Lloyd, John Jacob	Associate	3.90	510.00	1,989.00
Eason-Hall, Erica	Paralegal	0.30	360.00	108.00
	Totals	11.30		8,477.00

Disbursements:

Date	<u>Description</u>	Amount
07/08/19	DELIVERY SERVICES - VENDOR: UNITED PARCEL SERVICE * 6/26/2019 UPS WORLDWIDE SAVER 1ZA78T180497872799 FROM: LAURIE JOHNSON DALLAS TO: SANDY AU DLA PIPER HONG KONG HONG KONG Bank ID: WFB-DISB Check Number: 2147190	66.44
07/09/19	SERVICE OF PROCESS - VENDOR: SPECIAL DELIVERY SERVICE, INC PROCESS SERVICE. Bank ID: WFB-DISB Check Number: 2148723	278.79
07/31/19	ON-LINE RESEARCHING - VENDOR: PACER SERVICE CENTER PACER QTR2ND- USAGE 04/01/2019 - 06/30/2019 Bank ID: WFB-DISB Check Number: 2148764	0.90
07/31/19	ON-LINE RESEARCHING - VENDOR: PACER SERVICE CENTER PACER QTR2ND-PPRO USAGE 04/01/2019 - 06/30/2019 Bank ID: WFB-DISB Check Number: 2148764	0.90

Total Disbursements

Total Current Charges <u>USD 7,128.63</u>

<u>347.03</u>

DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China

M. Katz

August 13, 2019

Matter # 422483-000001 Invoice # 3806473

REMITTANCE ADVICE

Fees		8,477.00
Less 20% Discount		(1,695.40)
Current Fees		6,781.60
Current Disbursements		347.03
Total This Invoice	USD	7,128.63

Outstanding Invoice Summary

Date	Invoice	Amount	Payments/Adjustments	Balance
07/10/19	3790927	3,121.73	0.00	3,121.73
		Prior Outstandin	g Balance	3,121.73
		Total Accoun	nt Balance USD	10,250.36

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P.O. Box 75190 Baltimore, MD 21275

Or wire remittance to: Wells Fargo Bank, N.A.

1300 I Street, NW, 11th Floor West Tower Washington, DC 20005

Account Name: DLA Piper LLP (US) Account No.: Redacted ABA Transit No.: Redacted Swift Code: Redacted

Law Firm Tax Identification Number: Redacted

Or pay online: Go to www.dlapiper.com and click on "Make a

Payment" at the bottom of the screen

The invoice number and original amount due are needed for access to the payment center.

To ensure proper credit, please indicate the

invoice number you are paying on the wire

M. Katz
Matter # 422483-000001
Page 5
Invoice # 3806473
August 13, 2019



Case 1:18-cv-00444-RP Document 406-1 Filed <u>08/08/23</u>թ ըցցе 94 of 98

1900 North Pearl Street, Suite 2200 Dallas, Texas 75201

T 214-743-4500 F 214-743-4545 www.dlapiper.com

PRIVILEGED AND CONFIDENTIAL

DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China July 10, 2019

M. Katz Matter # 422483-000001 Invoice # 3790927

For Professional Services Through June 30, 2019

Client: Alejandro Vargas; Evan Jowers; Legis Ventures (HK) Ltd et al

Matter: Employment law advice; File No.:

00394055-000001

Fees		3,880.00
Less 20% Discount		(776.00)
Current Fees		3,104.00
Current Disbursements		17.73
Total This Invoice	USD	3,121.73
Prior Outstanding Balance		24,237.60
Total Account Balance	USD	27,359.33

Please send remittance to: DLA Piper LLP (US)

P.O. Box 75190 Baltimore, MD 21275

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1300 I Street, NW, 11th Floor West Tower

Washington, DC 20005

Account Name: DLA Piper LLP (US)
Account No.: Redacted
ABA Transit No.: Redacted

Swift Code: Redacted

Law Firm Tax Identification Number: Redacted

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M. Katz
Matter # 422483-000001
Page 2
Invoice # 3790927
July 10, 2019

Fees:

<u>Date</u>	Description	Timekeeper	<u>Hours</u>	Amount
06/12/19	Attention to matters regarding confidentiality of information; attention to matters regarding case status and strategy.	Katz, Marc Daniel	0.80	864.00
06/19/19	Determine optimal method of service of Hong Kong writ on R. Kinney in the United States under U.S. law and correspond with S. Au regarding same.	Bookhout, James C.	0.40	320.00
06/19/19	Attention to matters regarding service of process of Hong Kong lawsuit and attention to strategy issues.	Katz, Marc Daniel	0.30	324.00
06/20/19	Review Hong Kong Order and Concurrent Writ to Serve Out of Jurisdiction on Robert Kinney; receive instruction regarding same; coordinate with process server for rush service on Robert Kinney in Austin.	Eason-Hall, Erica	0.70	252.00
06/21/19	Coordinate service of process on R. Kinney; correspond with E. Jowers regarding success of same.	Bookhout, James C.	0.20	160.00
06/21/19	Receive status update from process server regarding attempted service of Hong Kong Writ on Robert Kinney.	Eason-Hall, Erica	0.10	36.00
06/21/19	Attention to service of Hong Kong complaint.	Katz, Marc Daniel	0.20	216.00
06/22/19	Conference with E. Jowers regarding case strategy and potential settlement discussions with R. Kinney.	Bookhout, James C.	1.00	800.00
06/25/19	Coordinate return of service affidavit on R. Kinney to S. Au in Hong Kong; correspond with E. Jowers regarding potential settlement discussions with R. Kinney.	Bookhout, James C.	0.20	160.00
06/25/19	Obtain executed Affidavit of Service of Writ on Robert Kinney; in Hong Kong matter; coordinate regarding next steps.	Eason-Hall, Erica	0.30	108.00
06/26/19	Conference with E. Jowers and Y. Vinokurova regarding potential settlement discussions with R. Kinney.	Bookhout, James C.	0.40	320.00
06/28/19	Conference with R. Mort regarding R. Kinney's potential liability in Hong Kong and U.S. matters and to float potential settlement discussions between clients.	Bookhout, James C.	0.40	320.00

Total Hours

5.00

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Matter # 422483-000001		Page 3	
Invoice # 3790927		July 10, 201	
	Total Fees	3,880.00	
	Less 20% Discount	(776.00)	
	Total Current Fees	3,104.00	

Time Summary

The following legal services were provided by DLA Piper LLP (US):

Timekeeper	Title	Hours	Rate	Amount
Katz, Marc Daniel	Partner	1.30	1080.00	1,404.00
Bookhout, James C.	Associate	2.60	800.00	2,080.00
Eason-Hall, Erica	Paralegal	1.10	360.00	396.00
	Totals	5.00		3,880.00

Disbursements:

Date	<u>Description</u>	<u>Amount</u>
06/26/19	SERVICE OF PROCESS - VENDOR: SPECIAL DELIVERY SERVICE, INC PROCESS SERVER	17.73
	Total Disbursements	<u>17.73</u>

Total Current Charges USD 3,121.73 DLA Piper Hong Kong 17th Floor, Edinburgh Tower The Landmark 15 Queen's Road, Central Hong Kong China

M. Katz

July 10, 2019

Matter # 422483-000001 Invoice # 3790927

REMITTANCE ADVICE

Fees		3,880.00
Less 20% Discount		(776.00)
Current Fees		3,104.00
Current Disbursements		17.73
Total This Invoice	USD	3,121.73

Outstanding Invoice Summary

<u>Date</u>	<u>Invoice</u>	Amount	Payments/Adjustments	Balance
06/19/19	3782191	24,237.60	0.00	24,237.60
	Prior Outstanding Balance			24,237.60
		Total Accour	nt Balance USD	27,359.33

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1300 I Street, NW, 11th Floor West Tower Washington, DC 20005

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Law Firm Tax Identification Number: Redacted

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M. Katz
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Page 5
Invoice # 3790927
July 10, 2019